



THE UNIVERSITY OF ARIZONA

University Compliance

University of Arizona Clery Act Departmental Delegation of Responsibilities

The University of Arizona's Clery Act compliance responsibilities are delegated to specific departments/units or positions.

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The University Compliance Office is responsible for:

- a. Monitoring the University's Clery Act compliance;
- b. Initiating needed centralized Clery Act Compliance activities (e.g., workgroups, inter - departmental collaboration, etc.);
- c. Remaining abreast of legal, regulatory, and related changes and providing information to key units/departments;
- d. Providing guidance and correction to key units/departments as required to fortify compliant practices;
- e. Updating the Clery Act Compliance policy as needed;
- f. Reviewing geographic categories annually, in consultation with IT/EGIS, Real Estate University of Arizona Police Department (UAPD) and other relevant departments;
- g. Reviewing separate campus classifications annually in consultation with IT/EGIS, Real Estate, UAPD, Arizona Online, Arizona International, and other relevant departments and colleges;
- h. Establishing procedures for collecting University-related, including sponsored/funded, student trip information (e.g., athletic trips etc.) to request crime statistics annually as required;
- i. Requesting crime statistics from local law enforcement agencies with jurisdiction related to the University's qualifying buildings and properties in coordination with UAPD;
- j. Identifying Campus Security Authorities (CSAs) annually;
- k. Annually notifying identified CSAs of their designation; providing the same with a reminder requesting formal notification/reporting of Clery Crime statistics;
- l. Making training available to identified CSAs;
- m. Maintaining the Campus Security Authority (CSA) training housed in EDGE Learning and acting as the designated learning administrator;
- n. Maintaining formal notification/reporting mechanism(s) for use by non-police CSAs;
- o. Collecting all primary and ongoing prevention program and campaign information from departments for inclusion in the Annual Security and Fire Safety Report;
- p. Providing guidance related to the routine collection and reconciliation of Clery Crime data to units/departments that regularly receive relevant reports, including the Office of Institutional Equity, Housing and Residential Life, Dean of Students Office, Threat Assessment and Management Team /Office of Public Safety, Survivor Advocacy program, Human Resources and Athletics;
- q. Initial classification, counting, reconciliation and auditing of CSA reports received from Housing, Threat Assessment and Management Team and Dean of Students Office (Conduct and CARE). Maintaining audit records;
- r. Providing UAPD with guidance and tools to facilitate crime statistic reconciliation and audit; collaborating on statistical determination and documentation;
- s. Coordinating, preparing, publishing, and distributing the University's Annual Security and Fire Safety Report (ASR) and documenting these activities;
- t. Ensuring notices of the availability of the ASR are appropriately drafted and made available to students and employees;

- u. Ensuring notices of the availability of the ASR are made available to prospective students and employees through coordination with Human Resources, Enrollment Management, and the Graduate College;
- v. Submitting crime and fire statistics to the U.S. Department of Education via the Campus Safety and Security Survey;
- w. Coordinating additional needed communication with the U.S. Department of Education related to the submission of crime and fire statistics;
- x. Managing the University's Clery Act compliance website;
- y. Developing customized training for departments, employees, and CSAs as determined to be necessary;
- z. Maintaining all Clery related records in accordance with the University's record retention schedule;
- aa. Providing paper copies of the ASR upon request.

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The University of Arizona Athletics Department is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in the department if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- c. Notifying University Compliance of any locations that are controlled by athletic teams and are not located on the main campus (ex. lodging for repeated use and short stay-away trips and locations where a written agreement {including examples such as hotel registration/receipt, lease or agreement related to an outdoor field, course, pool, indoor facility, etc.} provides the University with control of the space);
- d. Ensuring that prospective employees are provided with notice of availability of the ASR if recruitment is external to positions posted on UATalent;
- e. Collaborating with University Compliance as needed to ensure accurate and timely identification of CSAs including significant staff changes;
- f. Maintaining all Clery related records in accordance with the University's record retention schedule;
- g. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona, Arizona International Division is responsible for:

- a. Ensuring that prospective students are provided with notice of availability of the ASR (mainly via information on the Undergraduate Admissions or Graduate College website);
- b. Ensuring that prospective and current students are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu);
- c. Notifying University Compliance of any new, or changed, locations within the Arizona International network of microcampuses;
- d. Notifying University Compliance of any non-microcampus locations outside of main campus controlled by Arizona International, including locations where a written agreement provided the University with temporary control of the location (ex. lodging for repeated use and short stay-away trips, leases or agreements related to facilities including outdoor space);
- e. Identifying duty-specific CSAs (ex. trip leaders) and provision of relevant training;
- f. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- g. Maintaining all Clery related records in accordance with the University's record retention schedule;
- h. Timely provision of requested/required information to University Compliance for inclusion in the ASR including information on prevention and awareness programs and campaigns.

The University of Arizona Campus Health Services is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in the unit if the crime is not confirmed to have previously been formally reported;
- b. Overseeing compliance with the Drug Free Schools and Communities Act;
- c. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- d. Maintaining all Clery related records in accordance with the University's record retention schedule;
- e. Timely provision of requested/required information to University Compliance for inclusion in the ASR including information on prevention and awareness programs and campaigns.

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The University of Arizona Dean of Students Office (all areas) is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in DOS if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- c. Adherence with established university procedures related to missing residential students;
- d. Assistance with identification of CSAs (ex. organizational advisors, trip leaders, etc.);
- e. Reporting University-related, including funded/sponsored, organizational and student related travel information;
- f. Annually certifying locations that are known to be owned or controlled by fraternities and sororities and other recognized student organizations; promptly notifying University Compliance of any changes to locations that are owned or controlled by fraternities and sororities and other recognized student organizations;
- g. Notifying University Compliance if any fraternities, sororities, or other recognized student organizations lose recognition;
- h. Adherence to Clery Act, and related, processes, procedures and policies and requirements related to disciplinary procedures including ensuring compliance with all procedural requirements of the Violence Against Women Act amendments to the Clery Act;
- i. Ensuring that officials involved in the investigation or resolution of sexual assault, dating violence, domestic violence and stalking receive annual training which includes all required elements including how to conduct an investigation and disciplinary process that protects the safety of the victim and promotes accountability;
- j. Maintaining all Clery related records in accordance with the University's record retention schedule;
- k. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona Graduate College is responsible for:

- a. Ensuring that prospective students are provided with notice of availability of the ASR (mainly via information on the Graduate College website);
- b. Ensuring that prospective and current students are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu).
- c. Maintaining all Clery related records in accordance with the University's record retention schedule.

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The University of Arizona Department of Housing and Residential Life is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in Housing if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and resource information (directly or via prompt reporting to OIE);
- c. Adherence to Clery Act, and related, processes, procedures, policies, and requirements related to disciplinary procedures;
- d. Adherence with established university procedures related to missing residential students;
- e. Providing University Compliance with an update when new residential facilities are added including those added temporarily through contract or other arrangement (including temporary overflow housing);
- f. Assistance with identification of CSAs (ex. camp and conference leaders etc.);
- g. Posting/distribution of Clery Timely Warnings and Emergency Notifications to known temporary residents (ex. camps, conferences);
- h. Facilitating fire reporting and fire safety requirements as requested by key departments;
- i. Maintaining all Clery related records in accordance with the University's record retention schedule;
- j. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona Human Resources Department is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in Human Resources (HR) if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that prospective employees are provided with notice of availability of the ASR (mainly via inclusion in job postings);
- c. Ensuring that prospective and current employees are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu);
- d. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- e. Ensuring that new employees are provided access to primary prevention and awareness programs which comport with 34 CFR §668.46(j)(1)(i);
- f. Adherence to Clery Act, and related, processes, procedures, policies, and requirements related to disciplinary procedures;
- g. Identification of CSAs via UCAP position, facilitation of/notice to new employees of their identification as a CSA;
- h. Regular communication with University Compliance of new hires and terminations/changes related to CSA identification;
- i. Ensuring all employee-related Clery Act required processes, procedures/policies are satisfied (including documentation of alcohol and drug policies and provision of abuse resources and related disciplinary documentation);
- j. Maintaining all Clery related records in accordance with the University's record retention schedule;
- k. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona Office of Institutional Equity is responsible for:

- a. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information;
- b. Promptly reporting any Clery Crimes reported to CSAs in OIE if the crime is not confirmed to have previously been formally reported;
- c. Adherence to Clery Act, and related, processes, procedures, policies, and requirements related to disciplinary procedures including ensuring compliance with all procedural requirements of the Violence Against Women Act amendments to the Clery Act;
- d. Ensuring that officials involved in the investigation or resolution of sexual assault, dating violence, domestic violence and stalking receive annual training which includes all required elements including how to conduct an investigation and disciplinary process that protects the safety of the victim and promotes accountability;
- e. Developing and maintaining the University's centralized process to provide students and employees who report that they are the victim of sexual assault, dating violence, domestic violence or stalking with a written explanation of their rights and options under the Clery Act;
- f. Maintaining all Clery related records in accordance with the University's record retention schedule;
- g. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona Outreach, Distance & Continuing Education is responsible for:

- a. Ensuring that prospective students are provided with notice of availability of the ASR (mainly via information on the Undergraduate Admission website);
- b. Ensuring that prospective and current students are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu);
- c. Notifying University Compliance of the addition of new, or changed, locations within the Near You Network, including District Partner locations;
- d. Maintaining all Clery related records in accordance with the University's record retention schedule;
- e. Identifying duty-specific CSAs at each Near You Network campus, District Partner location (or similar facility) and provision of relevant training;
- f. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.

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The University of Arizona Police Department is responsible for:

- a. Collecting, classifying, counting, and disclosing crime statistics reported to UAPD, including those crimes reported by CSAs;
- b. Classifying crimes, conducting reconciliation and auditing regularly (ex. bi-weekly or monthly), maintaining a detailed audit trail of the identification/determination of which reported crimes should be included in the Clery Crime statistics;
- c. Evaluating all reports of crime for statistical counting, crime log entry, and Clery Timely Warnings or Emergency Notifications;
- d. Creating and maintaining the daily crime log;
- e. Assessing crime reports for purposes of determining whether a timely warning should be distributed; documenting assessment, determination, and issuance of same;
- f. Assessing, in collaboration with other professionals as needed, whether circumstances require the issuance of an Emergency Notification;
- g. Investigating bias-related criminal incidents to determine whether a Clery-reportable hate crime occurred;
- h. Investigating all reports of missing residential students in adherence with established university procedures;
- i. Ensuring that all fires not known to be accidental are brought to the attention of the University fire marshal to be investigated/considered for a determination related to arson;
- j. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with Victim's rights and options information, preferably via university published brochures;
- k. Maintaining all Clery related records in accordance with the University's record retention schedule;
- l. Timely provision of requested/required information to University Compliance for inclusion in the ASR including, crime statistics, policy and procedure updates, and information on prevention and awareness programs and campaigns.

The University of Arizona Office of the Provost is responsible for:

- a. Ensuring that officials, within their affiliate programs and units, involved in the investigation or resolution of sexual assault, dating violence, domestic violence and stalking receive annual training which includes all VAWA/Clery required elements including how to conduct an investigation and disciplinary process that protects the safety of victims and promotes accountability;
- b. Offering complaint prevention and awareness programs and campaigns to all incoming students through designated departments (34 CFR §668.46(j)(1)(i));
- c. Maintaining all Clery related records in accordance with the University's record retention schedule;
- d. Notifying University Compliance of the addition of new, or changed, locations reported to the Department of Education through the Database of Accredited Postsecondary Institutions and Programs (DAPIP);
- e. Notifying University Compliance of the addition of new, or changed, locations owned or controlled by the university and used for an educational purpose (e.g., classes, student research, student housing);
- f. Timely provision of requested/required information to University Compliance for inclusion in the ASR including information on prevention and awareness programs and campaigns.

The University of Arizona Office of Public Safety/Emergency Management is responsible for:

- a. Managing, in collaboration with other professionals as needed, processes and procedures for emergency notification systems;
- b. Assessing, in collaboration with other professionals as needed, whether circumstances require the issuance of an Emergency Notification;
- c. Conducting Clery Act required “test” of emergency plans and capabilities designed for assessment and evaluation of emergency plans and capabilities; the test shall be wide-scale, and include participation from key departments and local response agencies;
- d. Conducting appropriate on-going follow-up activities designed for assessment and evaluation of emergency plans and capabilities;
- e. Maintaining all Clery related records in accordance with the University’s record retention schedule;
- f. Timely provision of requested/required information to University Compliance for inclusion in the ASR.

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The University of Arizona Office of Public Safety/Risk Management and University Facility Services (Fire Marshal) is responsible for:

- a. Producing the Annual Fire Safety Report (to be incorporated in the ASR) in accordance with current law, regulation, and guidance;
- b. Creating and maintaining the fire log;
- c. Ensuring completion and documentation of all fire drills and exercises conducted including tracking all fire drills conducted in each residential facility;
- d. Tracking and documenting the number of fires in each residential facility;
- e. Annually notifying University Compliance of any titles of persons or organizations to which students and employees should report fires;
- f. Annually providing to University Compliance a list of any fire safety education and training programs provided to students and employees;
- g. Annually providing University Compliance with fire safety system information for student housing facilities;
- h. Maintaining all Clery related records in accordance with the University's record retention schedule;
- i. Timely provision of requested/required information to University Compliance for inclusion in the ASR.

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The University of Arizona Office of Public Safety/Threat Assessment and Management Team is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in Threat Assessment & Management Team (TAMT) if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- c. Adherence with established university procedures related to missing residential students;
- d. Maintaining all Clery related records in accordance with the University's record retention schedule;
- e. Timely provision of requested/required information to University Compliance for inclusion in the ASR including information on prevention and awareness programs and campaigns.

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The University of Arizona Survivor Advocacy program is responsible for:

- a. Promptly reporting any Clery Crimes reported to CSAs in the office if the crime is not confirmed to have previously been formally reported;
- b. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information;
- c. Timely provision of requested/required information to University Compliance for inclusion in the ASR including information on prevention and awareness programs and campaigns.

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The University of Arizona Office of Undergraduate Admissions is responsible for:

- a. Ensuring that prospective students are provided with notice of availability of the ASR (mainly via information on the Undergraduate Admission website);
- b. Ensuring that prospective and current students are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu);
- c. Maintaining all Clery related records in accordance with the University's record retention schedule.

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All administrators for locations determined to be Clery Separate Campuses are responsible for:

- a. Ensuring that prospective students are provided with notice of availability of the ASR (mainly via the Undergraduate Admissions and Graduate College website);
- b. Ensuring that prospective and current students are provided with a paper copy of the ASR upon request (through direct provision or direction to cleryact@arizona.edu);
- c. Notifying University Compliance of the addition of any new locations or properties related to the campus;
- d. Ensuring that victims reporting sexual assault, dating violence, domestic violence, and stalking are provided with appropriate victim's rights and options information (directly or via prompt reporting to OIE);
- e. Notifying University Compliance of any locations that are controlled by the campus, outside of main campus, including locations where a written agreement provided the University with temporary control of the location (ex. lodging for repeated use and short stay-away trips, leases or agreements related to facilities including outdoor space);
- f. Notifying University Compliance of any changes related to the employment of security or police for the campus including alterations related to routine patrols;
- g. Maintaining all Clery related records in accordance with the University's record retention schedule;
- h. Timely provision of requested/required information to University Compliance for inclusion in the ASR including policy and procedure updates, and information on prevention and awareness programs and campaigns.