



CRR: Campus Safety, Including Clery

Compliance Risk Areas

Compliance Risk Areas	Related Governing Laws, Rules, Regulations, or University Policies
<p><u>Clery Campus Security Policy and Reporting</u> (Use Department of Education Handbook for Campus Safety and Security Reporting) (DOE can fine \$54,789 per violation)</p> <ul style="list-style-type: none"> • Emergency notification and evacuation procedures • Primary and ongoing prevention and awareness programs and campaigns • Timely warnings • Daily crime log • Fire log • Crime reports from Campus Security authorities (CSA) • Identify & Train CSAs • Crime statistics from local law enforcement • Submit crime and fire statistics to the DOE • Policy and procedures for disciplinary action in cases of dating violence, domestic violence, sexual assault, and stalking 	<ul style="list-style-type: none"> • Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20 USC §1092(f); 34 CFR 668.46 • Violence Against Women Reauthorization (VAWA) Act (added to Clery), 42 USC §§ 13701 through 14040; 34 CFR 668.46 • Institutional Fire Safety Policies and Fire Statistics, 34 CFR 668.49 • Reporting and Disclosure of Information, 34 CFR 668.41

Call the Chief Compliance Officer at (612) 626-7852 with questions.



<ul style="list-style-type: none">• Missing student notification procedures• Publish annual security report• Publish annual fire safety report• Identify Clery Geography and maintain a list of property by geographic category• Notification to prospective students and employees	
<p>Drug and Alcohol Abuse Prevention</p> <ul style="list-style-type: none">• Initiative to Reduce Binge Drinking and Illegal Alcohol consumption• Annual distribution of information to each student and employee• Biennial Review of Drug and Alcohol abuse prevention program	<ul style="list-style-type: none">• Higher Education Act, 20 USC 1011h, 1011i• Drug and Alcohol Abuse Prevention, 34 CFR Part 86• Reporting and Disclosure of Information, 34 CFR 668.41• Board of Regents Policy: Alcoholic Beverages on Campus• Administrative Policy: Drug Free University
<p>Licensed and Trained Security Personnel</p>	<ul style="list-style-type: none">• Minnesota Peace Officers Standards and Training (POST)
<p>Emergency Management</p>	<ul style="list-style-type: none">• Administrative Policy: Continuity of Operations (COOP)
<p>Building Security</p>	<ul style="list-style-type: none">• Administrative Policy: Getting Access to University Buildings
<p>Access to and Use of Physical Security Data</p>	<ul style="list-style-type: none">• Administrative Policy: Access to and Use of Physical Security Data
<p>Possession and Carrying of Weapons</p>	<ul style="list-style-type: none">• Board of Regents Policy: Possession and Carrying of Weapons

Call the Chief Compliance Officer at (612) 626-7852 with questions.

General compliance questions for each risk area

1. How is compliance with the policy monitored?
2. What is the frequency of the monitoring?
3. What are the typical noncompliance issues found and how are they corrected?
4. If internal audit has conducted a review of relevant areas within the last 3 years, what steps were taken to address the audit findings?
5. Describe the process for reporting compliance in the relevant area to senior leadership, including the typical content of the reports and the senior leaders who receive the reports.

Clery Act Reporting

1. Are checklists from the 2016 DOE Handbook for Campus Safety and Security Reporting employed to achieve compliance?
2. What Clery Act requirements, if any, are most difficult to achieve?
3. How are individuals who are required to complete Clery Act related training identified?
4. Is Clery Act related training required to be taken by any employees? If so:
 - a. Please describe
 - b. What is the current compliance rate with the training?
5. What is the current compliance rate with Clery Act related training?
6. What resources or procedures could help with meeting Clery Act requirements?

Drug and Alcohol abuse prevention program

1. Does the campus conduct biennial reviews of its Drug and Alcohol abuse prevention program?
2. Identify personnel who contributed to the most recent campus biennial review.
3. How does the campus distribute illegal drug and alcohol information to students and employees?

Call the Chief Compliance Officer at (612) 626-7852 with questions.



Licensed and trained security personnel

1. Where are licensing and training records maintained for campus security personnel?
2. Where are written policies required by the Minnesota Peace Officer's Standards and Training (POST) Board published?
3. Has the POST Board conducted an audit of the campus department within the past three years?
4. What are the department's procedures for protecting or releasing data obtained through the department's policing and security operations?
5. What is the process for establishing criminal investigative responsibility (between University, local, state, or federal)?

Emergency Management

1. Does the campus have an Emergency Operations Plan?
2. Has the campus conducted an emergency operations exercise within the past year?
3. Does the AHC Office of Emergency Response have plans?
4. Has the AHC Office of Emergency Response conducted an exercise within the past year?

Building Security

1. Does the campus have specific key or electronic access control procedures?
2. Who checks that department facilities representatives/department area coordinators are meeting their responsibilities under the University Policy?
3. Does the campus know its annual costs for lost keys or access cards (costs for re-keying or upgrades to centrally managed access control)?
4. What are the biggest campus building security challenges?
5. What buildings/areas (e.g. specific laboratories) does the campus recognize as a higher security risk?
6. Does the campus record instances of, and action taken, for unauthorized possession, use, duplication, or changes to keys or access control devices?

Call the Chief Compliance Officer at (612) 626-7852 with questions.



7. Does the campus record instances of, and action taken, for the bracing open of doors equipped with access control devices?

Access to and Use of Physical Security Data

1. Does the campus identify authorized users granted access to physical security data?
2. Does the campus conduct checks to ensure that physical security data is used for authorized purposes?
3. Does the campus have a policy or procedure for storage of physical security data?
4. Has the campus experienced security incidents, as defined in the policy, since the policy was established in January 2016?

Possession and Carrying of Weapons

1. Does the campus have a policy for lawful storage of a firearm?
2. How does the campus inform students and employees of this policy?
3. Does the campus record instances of, and action taken, for violation of the campus weapons policy?

Call the Chief Compliance Officer at (612) 626-7852 with questions.