INCIDENT REPORT WRITING AND RECORDS MANAGEMENT SYSTEMS FOR CLERY ACT COMPLIANCE:

CONSIDERATIONS FOR CAMPUS POLICE AND PUBLIC SAFETY AGENCIES

omnigo

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When configured and used correctly, incident report writing and records management systems can be a substantial boon to Clery Act compliance efforts, especially as it relates to using these systems to identify the institution's Clery crime statistics. In contrast, systems not designed with Clery compliance in mind, or systems not correctly configured and utilized by campus agencies, can contribute to conditions that adversely affect the accuracy and completeness of an institution's crime statistics.

Such outcomes undermine the law's intent to provide accurate and complete data on which students, employees, and the public-at-large can rely. They also can expose institutions to potential fines for underreporting of crimes, as the law requires the U.S. Department of Education[2] to impose fines when it determines that an institution has "substantially misrepresented the number, location, or nature of the crimes"[3] it reports to the Department and discloses in its Annual Security Report. ED can impose the maximum fine amount (currently $59,017)[4] for each missing criminal offense.[5] These fines can add up quickly, thereby imploring agencies to consider how the records management system they use (or intend to use) will facilitate the accurate reporting of crime statistics.

BACKGROUND

Many campus police and public safety practitioners already understand the importance of having a high-quality incident report writing and records management system. These systems often have multiple capabilities that allow agencies to document officer shift activity, track calls for service via a computer-aided dispatch module, and review and approve initial and investigative reports through the agency's chain-of-command. They also typically leverage various analytical tools to meet internal and external reporting requirements (such as UCR reporting) and streamline crime analysis and crime mapping efforts.

The use case for having such a system is abundantly clear to anyone who has spent time working in, with, or for a campus police or public safety agency.

However, these systems can also bolster an institution's records management program and, in doing so, assist in meeting relevant Federal compliance standards. In the higher education context, such standards can be traced back to the moment when an institution's chief executive officer signs a Program Participation Agreement (PPA) with the U.S. Department of Education. In its PPA, the institution pledges (in exchange for the opportunity to participate in Title IV, HEA federal student financial aid programs) to comply with the "standards of administrative capability."[6] These standards require institutions to demonstrate their ability and willingness to meet numerous requirements associated with Title IV, HEA programs, including the Clery Act. Of note for this whitepaper is the need to establish and maintain relevant records that document the institution's compliance with all statutory provisions of or applicable to Title IV of the Higher Education Act, including the Clery Act.[7]

There is an entire section of the Code of Federal Regulations devoted to record retention requirements.[8] The regulations call for institutions to maintain either hard copy or electronic records "in a systemically organized manner."[9] Electronic versions "must be capable of reproducing an accurate, legible and complete copy of the original document and, when printed, this copy must be approximately the same size as the original document.[10] Institutions must retain all relevant records relating to its administration of Title IV, HEA programs "for three years after the end of the award year for which the aid was awarded and disbursed."[11] For Clery Act purposes, the Department's 2016 Handbook for Campus Safety and Security Reporting clarifies that all records related to the institution's Clery Act compliance must be retained for "three years from the latest publication of the report to which they apply."[12] Practically speaking, this means supporting records – including documentation of reported crimes – must be retained for seven years.[13]

BENEFITS OF AN INCIDENT REPORT WRITING AND RECORDS MANAGEMENT SYSTEM

Although the Clery Act does not require a third-party electronic incident report writing and records management system, implementing such a system (or developing a "home-grown" system) can significantly help institutions maintain records in a systematically organized manner. It is common for these systems to track incident-specific details using a unique report identifier (such as a report and/or case number). These identifiers are assigned automatically upon submitting a report that feeds into the system and provides a sequential accounting of all agency-written reports. Various incident-level attributes can be tracked in these systems, including the identities of the parties involved, their roles (such as suspect, witness, or victim), the incident location, the type of crime(s) reported, and other pertinent details of the reported incident, such as the date and time it was reported and/or occurred. The status of these reports can be tracked in the system through

any approval or investigative processes within the agency. In many systems, supporting documentation can be uploaded to a secure central repository, which not only enables all relevant records to be readily retrieved and examined via the system for Clery Act purposes, but also enables agencies to maintain records for the requisite seven-year duration before purging them from the system.

Contemporary incident report writing and records management systems allow for streamlined reporting, tracking, storage, retrieval, and querying of relevant records and the information they contain. Such capabilities are indispensable to a campus police or public safety agency's ability to identify and review reports for potential Clery crimes that need to be disclosed in the Annual Security Report and in the annual crime statistics the institution submits to the Department.[14,15]

To adequately fulfill these compliance functions, the records management system must be designed with Clery in mind. If Clery is an afterthought, an agency can only use the system to cultivate its Clery crime data if the system is sufficiently customizable to allow the institution to use the system to meet Clery compliance needs. The remainder of this whitepaper will address some of the most pertinent issues in that regard.

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[8] These requirements may be found at 34 C.F.R. §668.24.

[9] 34 C.F.R. §668.24(d)

[11] 34 C.F.R. §668.24(e)(1)

[12] U.S. Department of Education, Office of Postsecondary Education, The Handbook for Campus Safety and Security Reporting, 2016 Edition [2016 Handbook], Washington, D.C. 9-11, http://www.ed.gov/admins/lead/safety/campus.html.

[13] Interestingly, in a footnote contained in the Campus Crime Final Program Review Determination Letter involving Penn State University, the Department noted "The standard Title IV record retention requirement as applied to the Clery Act effectively dictates that an institution retain all documents and information that may be relevant to administration of its campus safety and Clery Act compliance program for three full years after the last time that said document is used or relied upon to substantiate the institution's actions or inactions. This period is often referred to as a seven-year period; however, for most purposes the actual duration of the period is six years and nine months." See Campus Crime Final Program Review Determination Letter, Penn State University (2016), 75 (FN36), available at: https://studentaid.gov/sites/default/files/PSCFPRD10327991.pdf

[14] While it is commonly understood among practitioners in the regulated community that institutions must disclose statistics in the Annual Security Report and report them to the Department, it bears noting these are distinct statutory requirements, required by 20 U.S.C. §1092(f)(1)(F) and 20 U.S.C. §1092(f)(5). For this reason, a misclassification or underreported offense that is excluded from the Annual Security Report disclosures is also likely to be missing from the statistics submitted to the Department, thus compounding the violation and increasing the risk of fines an institution may face for such actions.

[15] In some platforms, reported crimes can also be efficiently migrated to a Daily Crime Log which allows the agency to rely upon its system for fulfilling multiple compliance functions. Some third-party systems can also assist agencies in maintaining a Fire Log and fire statistics for On-Campus Student Housing Facilities. However, as the focus of this whitepaper is the institution's crime statistics, these capabilities will not be addressed.

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CLASSIFYING CLERY ACT CRIMES

A staple feature in most campus police/public safety records management systems is a drop-down menu of incident classifications that can be associated with a specific report (when the report is authored, following submission of the report into the system, or both). An incident classification field enables the agency to code the offense based on the incident's corresponding nature as described in the report. Adding an incident classification to a report allows the report to populate in relevant queries or analytics run in the system by incident classification type. Tracking this type of data allows an agency to meet reporting requirements and have a more sophisticated understanding of the nature and frequency of incidents occurring within their jurisdiction.

These fields are often highly customizable. Many departments choose to populate these drop-down lists with relevant crime classifications drawn from the state crime or penal code. If the field is either designed or viewed more broadly as an incident classification field, rather than a crime classification field, non-criminal offense or call types may also appear as options available to an officer when classifying the nature of the incident documented in the report.

While the inclusion of state crime or penal code classifications can be valuable, the definitions and standards used for classifying crimes under these codes often differ in meaningful ways from the definitions and standards used for classifying offenses for Clery Act reporting purposes. As a result, the state crime or penal code classifications are not always synonymous with Clery crimes bearing similar names and may need to be "translated" from the state crime or penal code categories into the corresponding Federal crime categories and definitions used for Clery Act reporting.

For this reason alone, an agency could not simply run a query of state crime classifications to generate their Clery data for a given year.[16] Not only is there rarely a one-to-one correspondence between how a crime

may be classified using jurisdictional definitions and how that same offense may be classified using Clery Act definitions, but there may be incidents that are crimes for Clery Act purposes even though no corollary crime exists in the jurisdiction (as sometimes will occur when jurisdictional crimes do not include incidents that meet the definition of Dating Violence under the Clery Act).

There are generally two options systems will provide for dealing with this issue. The first option involves adding all Clery Act crime categories to the incident classification drop-down list. Adding these crimes will ensure that all required crime categories are available as classification options (including those crimes for which no equivalent state crime or penal code classification exists). This practice enables an institution to utilize the drop-down menu to record the applicable crime classification of a reported incident under the state crime or penal code and any Clery Act crime(s) documented in the report. Because some analytics or other modules in the system may rely on the incident classification drop-down menu to populate the output of certain analytics or to feed data into other modules, this approach may be necessary for institutions that are using a system to help facilitate compliance with the Clery Act when the system has not been expressly designed for that purpose.

[16] *There are many other reasons such an approach would be foolhardy. For example, if officers do not classify all possible crimes denoted by the report, and instead only classify the most serious crime or the one for which a suspect is arrested, other reported crimes documented in the narrative will not be detectable in the system through a simple query of incident or crime classifications. Furthermore, there are numerous rules that dictate how and when an agency should apply the UCR Hierarchy Rule in a multiple-offense situation, and application of this rule is limited to only one of the four general categories of crime statistics that are reported for Clery Act purposes. There are also Clery-specific exceptions to the Hierarchy Rule which are outlined at 34 C.F.R. §668.46(c)(9).*

More advanced systems designed with Clery in mind have a distinct field or fields in which practitioners can record the applicable Clery reportability separately from the general crime or incident classification. This allows institutions to separate the function of classifying reports for general purposes from the more specific function of classifying reports for Clery Act purposes. This may be advisable for agencies that do not want the applicable Clery classifications to appear in the incident/offense reports logged in the system (as these reports may be used for various purposes, and the Clery Act would not be relevant for most of them).

Separating these classifications is also advantageous for agencies that task only one or two people in the organization with the responsibility of reviewing crime reports and classifying them for Clery Act purposes. While officers have expertise in the state crime or penal codes they enforce, they often do not have the same level of expertise in classifying and counting crimes for Clery Act purposes. Agencies aware of the different classification schemes often separate these functions and rely on a person with specialized Clery training to classify the reports for Clery Act purposes.

Separating the part of the system where Clery classifications are recorded from the part of the system where general classifications are recorded makes a lot of sense for agencies with different people performing these discrete functions. In such a model, workflows can be developed based on personnel's roles and/or responsibilities with access to the system. Furthermore, if there is a distinct field in the system where the Clery-reportability of an incident can be recorded, that field can be used to document that a report has been reviewed and assessed not to be Clery-reportable. Having such a field can provide reasonable assurance that the person with the authority, responsibility, and training to classify reports for Clery Act purposes has reviewed the report and determined it not to be reportable.

Such a field also enables institutions to run a query using the Clery classification field(s) to ensure all reports requiring review have indeed been reviewed. Any report that populates in the query with a null value in the Clery classification field would signal that the report has not been reviewed for Clery Act purposes (since any report that has been reviewed would have the applicable Clery crime[s] associated with the report, or the report would bear the applicable label that indicates it has been deemed not to be reportable). This creates an opportunity to serve as an important check and balance for reports logged in the records management system, thus enhancing the institution's administrative capability.[17]

Allowing for a dedicated field to record the applicable Clery crime(s) for each incident also enables more robust reporting of Clery statistics from the system. Existing Clery analytics that are native to the system can efficiently filter cases that have been flagged by a user as Clery-reportable. Once an incident has been identified as Clery-reportable, it can then be included in a special report that only includes offenses deemed to constitute Clery crimes that need to be included in the annual statistical disclosure. Such a document is commonly referred to as an "audit trail" (audit trails are discussed in more detail elsewhere in this whitepaper).

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[17] One of the standards of administrative capability to which institutions are held accountable includes having "adequate checks and balances in its system of internal controls" (34 C.F.R. §668.16(c)(1).

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A system that does not have a dedicated field for Clery classifications can also be adapted to create a list of reportable offenses contained in the system. In such a case, a custom query would need to be developed by the institution so that only Clery crimes are populated in the query's output. Institutions utilizing such a query need to ensure it includes all crimes and locations the institution must report in its statistics. The likelihood of such a query producing accurate and complete data will be affected by the agency's practices for recording the Clery crime classification in the incident classification menu. For example, the person classifying crimes would need to adopt a consistent methodology for adding the same crime to the same case numerous times if more than one incident of a Clery crime is documented in the report and there is no other way to identify the number of offenses documented in that case (e.g., a Burglary of a suite-style On-Campus Student Housing Facility would need to be recorded as 5 Burglary offenses if the common area of the suite, and all four bedrooms, were burglarized).

Additionally, Clery crimes would have to be added to the case from the incident classification list in a manner that conforms to the various rules for disclosing offenses, including the selective application of the UCR Hierarchy Rule as required by the Clery Act. For example, an incident that involves both a Robbery and an Aggravated Assault should only be classified as Robbery for purposes of the annual statistics since the Aggravated Assault would not be disclosed in the annual statistical disclosure.[18]

One could easily imagine other cases in which multiple offenses can be gleaned from a report narrative, but all offenses should not be included in the crime statistics (such as Clery crimes that are documented in the narrative, some of which did not occur on or within the institution's Clery Geography and therefore should not be included in the crime statistics).

It bears noting that even in a system that has a dedicated Clery field where the offense's classification can be recorded for Clery Act purposes, it is unlikely that the system has sufficient built-in safeguards that account for every permutation of the Hierarchy Rule and other rules and requirements for disclosing Clery Act crimes. Therefore, it will be incumbent upon the user responsible for selecting the reportability of offenses to possess and adequately apply their knowledge to the facts of each case to ensure the correct number and type of crimes are flagged for inclusion in the annual crime statistics.

[18] In such a case, an institution that uses the system to also populate the Daily Crime Log will have to develop a workaround for ensuring both the Robbery and Aggravated Assault would be added to the Daily Crime Log entry for that case since the UCR Hierarchy Rule does not apply to the crime log.

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Audit Trail

Regardless of the system utilized, institutions bear the final responsibility of ensuring the institution discloses accurate, complete, and fully-reconciled crime statistics. While the underlying reports that give rise to those statistics are commonly preserved in a records management system, the institution is also expected to possess (and be able to produce in a program review) an "audit trail" of all reportable offenses.

An audit trail identifies the subset of reported crimes that an institution plans to include (or has included) in its annual Clery Act statistical disclosures. Although the Department's Handbook for Campus Safety and Security Reporting does not expressly discuss such a document, it is virtually impossible for the Department to substantiate the accuracy and completeness of an institution's crime statistics if such a document does not exist and the absence of an audit trail can lead to findings of noncompliance in a program review.

The U.S. Department of Education routinely asks for an "audit trail" when conducting campus crime program reviews that examine, in part, the institution's crime statistics. By way of example, in the June 10, 2020 program review announcement sent to Lehigh University, the Department required the University to submit:

> An "audit trail" showing all incidents of crime (organized by offense classification). Each entry must include the incident report number, the agency or office that provided information and/or generated the report, and the geographical locations ("Clery Geography", i.e., on-campus, on-campus/residential facility, non-campus building/property or public property) that were reported to the Lehigh University Police Department (LUPD) or other Campus Security Authorities (CSAs), and were included in the statistical disclosures contained in the University's 2017-2019 ASRs.[19]
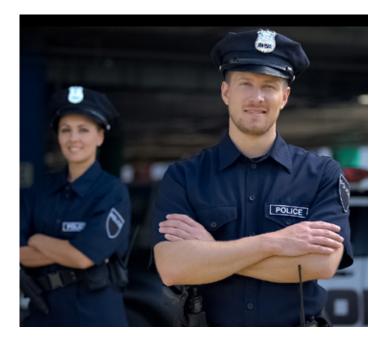
Given the importance of this type of documentation, a records management system that is being used to record Clery crime classifications should be capable of producing such an output, whether generated as a custom query by an individual user or whether the system contains a built-in analytic that can yield a compliant audit trail.

[19] U.S. Department of Education, Lehigh University Campus Crime Program Review Announcement, 3, available at: https://www.lehigh.edu/~inis/pdf/Lehigh-Notification-6.10.20-Final.pdf

Reports for Non-Police/Non-Security CSAs and Local Law Enforcement Agencies

While a system's ability to record the Clery crime classification for all offenses in the system is valuable, institutions are not only required to disclose incidents reported directly to the campus police or public safety department at an institution. The law expressly requires that all Clery crimes reported to local police agencies and a Campus Security Authority (CSA) of the institution must be included in the statistics when those offenses reportedly occurred on or within the institution's Clery Geography.[20] While all employees of the campus police or public safety agency are CSAs, other types of CSAs include non-police/non-public safety officials of the institution with significant responsibility for student and campus activities; individuals or organizations to which the institution directs students or employees to report crimes; and anyone who does not work for the campus police or public safety agency who nevertheless has responsibility for campus security.[21]

The requirement to include crimes reported to individuals outside the campus police or public safety department poses special challenges to campus law enforcement units. Namely, if a crime has not been reported directly to the campus police or public safety department, it will not be documented in an incident report within the agency's records management system without some additional action by the agency. If there is no trace of the crime report in the system, the applicable Clery classification of that crime report cannot be accounted for in the system, which means it will not be included in the relevant campus crime statistics and it will not be included in the Daily Crime Log (if the campus relies upon the system to generate its crime log).

Although many reports of crimes are likely to involve the campus police or public safety agency, not all do. The very concept of Campus Security Authorities under the Clery Act recognizes this inevitability. Common examples of crimes being reported to non-police/non-public safety officials include when lower-level Liquor Law Violations involve only housing or residence life officials, or when victims or third-parties make reports of Dating Violence, Domestic Violence, Sexual Assault, and Stalking to the Title IX Coordinator. All Clery crimes brought to the attention of CSAs need to be forwarded to the reporting structure of the institution, and at most institutions, that involves making a CSA report to the campus police or public safety department. If these departments want to rely on their records management systems for generating their annual Clery data, they will have to find a way of inputting relevant information into the system so that this can occur.

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[20] 34 C.F.R. §668.46(c)(1)
[21] 34 C.F.R. §668.46(a)(Campus security authority)(ii-iv)

Another example of Clery crimes for which a corresponding campus police or public safety report may not exist would include circumstances in which a crime is reported to a municipal law enforcement agency that subsequently informs the campus police or public safety agency of the crime report (often in response to the institution's annual request for Clery crime statistics). Any crimes brought to the campus agency's attention by the municipal agency need to be added to the crime log within two business days of the report when such crimes occur in a location covered by the Daily Crime Log,[22] and all Clery crimes occurring on or within the institution's Clery Geography must be included in the annual statistical disclosure.

For these reasons, a records management system will need to have the capability of allowing institutions to input relevant information from CSAs who reside outside the campus police or public safety unit as well as local law enforcement agencies in order to facilitate the inclusion of all reportable crimes in the statistics. In some systems, this may require the campus agency to write a report since the presence of a select fields in a report is necessary for the case to be included in the applicable Clery disclosures. This can be a cumbersome process when there is a high volume of such incidents.

In light of this, some records management systems have been built to provide campus agencies with a way of adding only the pertinent information from an external source to the system so that a complete crime log entry can be made and the crime can be recorded in the annual statistical disclosure (and appear on the institution's audit trail). This functionality may be especially appealing to sworn agencies who do not want to comingle reports written by their officers for crimes that have been directly reported to their agency with other crimes that are indirectly brought to their agency's attention (as the former crimes should be included in an agency's NIBRS disclosures if they participate in UCR reporting, whereas the latter would not be considered "known to law enforcement" and included in the sworn agency's NIBRS data).

[22] 2016 Handbook, 5-5

CATEGORIZING CLERY CRIMES BY LOCATION

The Clery Act requires not only that institutions accurately classify and count offenses in their annual statistics, but these statistics must be disclosed by the Clery-specific location categories prescribed by the law. Such categories are collectively referred to as the institution's "Clery Geography" and include On-Campus, Noncampus, and Public Property locations. For those institutions with On-Campus Student Housing Facilities, Clery crimes occurring in those facilities must be disclosed as a subset of the broader On-Campus category.[24] Because of these location-specific disclosure requirements, a records management system needs to have some capabilities for aggregating and disclosing offenses by Clery location categories.

Like recording of the incident's classification, this can be accomplished in numerous ways and will depend on the system's configuration and capabilities. Most systems will include a dedicated drop-down menu whereby the location of the incident can be identified. This list is usually customizable so that agencies can record distinct locations within their jurisdictions where officers may respond to calls for service or take reports of crimes.[25] Ideally, this list should be developed with Clery Geography in mind so that any Clery-reportable location of the institution has a distinct appearance in the list of available incident location options. This will allow officers to select the incident location in a manner that will comport with the institution's assessment of Clery-reportable locations and other locations where crimes may be reported to the agency but did not occur on or within the institutions' Clery Geography.

If the entirety[26] of an institution's Clery Geography is itemized in the drop-down menu of incident locations, an agency may be able to streamline its Clery Geography categorization of reportable incidents. For example, some systems allow institutions to associate, for each location, the Clery Geography category[27] so that when a report is flagged as Clery-reportable, it will be included in the statistics of the Clery Geography category that relates to that location. For example, if an Arson occurs inside of a location that constitutes an On-Campus Student Housing Facility at an institution, and the On-Campus Student Housing Facility is selected in the system as the "Incident Location" from the drop-down list, the system will automatically place the Arson statistic in both the On-Campus and On-Campus Student Housing Facility statistics for the applicable calendar year if the institution has properly configured the system to perform this task.

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[24] This means that any Clery crimes occurring inside of an On-Campus Student Housing Facility must appear in both the On-Campus Student Housing Facility statistics and the On-Campus statistics. For this reason, the number of offenses in a given crime category should never be higher in the On-Campus Student Housing Facility category when compared to the On-Campus category when those statistics pertain to the same calendar year.

[25] Some systems only allow for officers to input a free-text location rather than selecting from a centralized list of locations that are embedded in the system. Campuses utilizing such systems are encouraged to develop a standardized list of locations that have been developed with Clery Geography in mind and require officers to use these locations when identifying the incident location in the reports they enter into the system.

[26] By "entirety" we mean to include applicable streets and thoroughfares, or the portions thereof, that are reportable as either On-Campus or Public Property locations.

[27] The Clery Geography categories of On-Campus, Noncampus, and Public Property are mutually exclusive and exhaustive. However, the On-Campus Student Housing Facility subset of the broader "On-Campus" category is often discussed as its own category since the presentation of crime statistics will require separately disclosing these offenses in a dedicated column. However, as a technical matter, it is not a stand-alone category.

Such automation can help streamline efforts when carefully planned and executed. However, if the configuration of locations with their corresponding Clery Geography categories is inaccurate or incomplete, reliance on the system to place reportable offenses into their proper Clery Geography categories enhances the risk of improperly categorizing offenses by their Clery-specific locations. This is problematic, as miscoding of locations, or the failure to code locations as reportable, can cause Clery crimes to be reported in the wrong location category, or not reported at all, in contravention of the crime reporting requirements of the Clery Act.
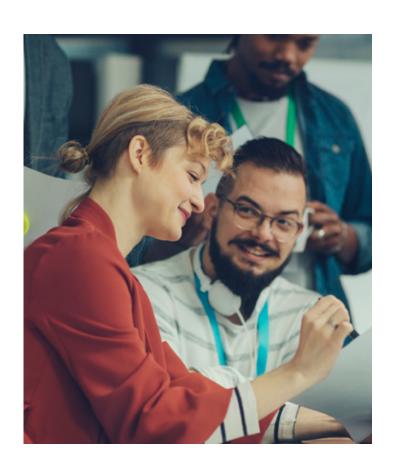

An alternative approach implemented by some records management systems is to let the user (rather than the system) decide the applicable Clery Geography category in which each reportable crime should be disclosed. This is often accomplished by prompting the user (at the report, person, or case level) to select the applicable Clery location category or categories related to each report. Such an approach does not require ongoing monitoring of the system's configuration to ensure that available incident locations are linked with their corresponding Clery Geography categories. Another benefit of this approach is that the drop-down incident location selected by the officer will not automatically dictate the Clery Geography category in which a statistic will be carried. This can help avoid miscategorization of offenses by location when an officer identifies the incident location by the nearest building, address, or landmark, or the location of an officer when they took a report, instead of identifying the precise location where the crime occurred (which may not, to the officer's credit, even be among the available options provided in the drop-down menu).

Regardless of the approach, it is incumbent upon institutions to fully and accurately assess the buildings and properties they own or control and the buildings or properties owned or controlled by an institution-recognized student organization to determine which locations must be reported as On-Campus or Noncampus locations. Additionally, the institution must have a complete understanding of the types of public property within or immediately adjacent to and accessible from their campus that are reportable as Public Property. Properly defining the institution's Clery Geography is a necessary precursor to disclosing statistics by location regardless of whether or how a records management system is used to categorize Clery crimes by location.

It is also necessary to appreciate that an institution may have multiple campuses for Clery Act purposes. Where this is the case, each campus must disclose statistics separately from one another. For this reason, any use of a records management system should account for the ability to disclose statistics separately by campus. If the institution has associated each incident location in the system with a corresponding Clery Geography category and the location is reportable, some system accommodations will be needed to ensure that the On-Campus, Public Property, and Noncampus locations of one campus do not get commingled with the On-Campus, Public Property, and Noncampus locations of another campus when statistical totals are tallied.

CONCLUSION

When thoughtfully developed, configured, and used, records management systems can be a powerful tool in preparing the institution's crime statistics. Institutions are strongly encouraged to consider obtaining a robust system that will meet their agency's needs for general campus law enforcement purposes as well as Clery compliance purposes. The right system, coupled with the proper training, can make lighter work of the tedious process of documenting crime reports and classifying, counting, and categorizing them by location per Clery Act requirements.

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