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May 22, 2018

Suzanne M. Johnson, Ph.D.
President
Green River College
12401 Southeast 320th Street
Auburn, WA 98092-3622

UPS Tracking #
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Re: Campus Crime Final Program Review Determination
OPE ID: 00378000
PRCN: 201610329349

Dear President Johnson:

On September 25, 2017, the U.S. Department of Education (the Department) issued a Program Review Report regarding Green River College's (GRC; the College) failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Drug-Free Schools and Communities Act (*DFSCA*). The original text of that report is incorporated into this Final Program Review Determination (FPRD). The College submitted an acceptable response to the Department's initial report on November 21, 2017. GRC's response and the supporting documentation submitted with the response are being retained by the Department and are available for inspection by the College upon request. Please be advised that this FPRD may be subject to release under the Freedom of Information Act and may be provided to other oversight entities now that it has been issued to the College.

Purpose:

Final determinations have been made concerning the findings identified during the program review. The purpose of this letter is to advise GRC of the Department's final determinations and to close the review. Please note that this FPRD contains several findings regarding GRC's failure to comply with the *Clery Act* and the *DFSCA*. Because these findings do not result in financial liabilities, they may not be appealed.

Due to the serious nature of these findings, this FPRD will be referred to the Administrative Actions and Appeals Service Group (AAASG) for consideration of a formal fine pursuant to 34 C.F.R. §668, Subpart G. If a fine action is initiated by AAASG, detailed information about the action and GRC's appeal rights will be provided under separate cover.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

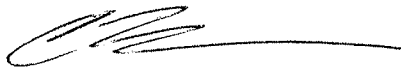
830 First St., N.E. Washington, D.C. 20202
StudentAid.ed.gov

Record Retention:

Records relating to the period covered by this program review must be retained until the later of the resolution of the violations identified during the review or the end of the regular record retention period applicable to all Title IV records, including *Clery Act* and *DFSCA*-related documents as set forth in 34 C.F.R. §668.24(e).

The courtesy and cooperation that was extended to Department officials throughout the program review process is appreciated. If you have any questions concerning this FPRD or the program review process, please contact Mr. Ricardo Brown on 215-656-8560 or at Ricardo.Brown@ed.gov.

Sincerely,



Candace R. McLaren, Esq.
Director
Clery Act Compliance Division

cc: Mr. Derek Ronnfeldt, Director of Campus Safety and Transportation, GRC
Mrs. Teresa Buchmann, Director of Financial Aid, GRC
Mr. James L. Moore, III, Senior Advisor, Clery Act Compliance/Campus Safety Ops, ED

Enclosure:

Final Program Review Determination

Prepared for:

Green River College

OPE ID: 00378000

PRCN: 201610329349

Prepared by:

U.S. Department of Education

Federal Student Aid

Clery Act Compliance Division

Final Program Review Determination
May 22, 2018

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A. The Clery Act and DFSCA

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*), in §485(f) of the Higher Education Act of 1965, as amended, (HEA), 20 U.S.C. §1092(f), is a Federal consumer protection statute that provides students, parents, employees, prospective students and employees, and the public with important information about public safety issues on America's college campuses. Each domestic institution that participates in the Federal student financial aid programs under Title IV of the HEA must comply with the *Clery Act*. The institution must certify that it will comply with the *Clery Act* as part of its Program Participation Agreement to participate in the Title IV, Federal student financial aid programs.

The *Clery Act* requires an institution to produce and distribute an Annual Security Report (ASR) containing its campus crime statistics. Statistics must be included for the most serious crimes against persons and property that occur in buildings or on grounds that are owned or controlled by the institution or recognized student organizations as well as on adjacent and accessible public property. These crimes are deemed to have been reported anytime such offenses are brought to the attention of an institution's campus police or security department, a local or state law enforcement agency of jurisdiction, or another campus security authority (CSA). A CSA is any institutional official who is: 1) designated to receive reports of crime and/or student or employee disciplinary infractions, such as Human Resources and Alternative Dispute Resolution professionals, and/or 2) has significant responsibilities for student life or activities, such as residential life staff, student advocacy and programming offices, and athletic department officials and coaches.

The ASR also must include several statements of policy, procedure, and programmatic information regarding important issues of student safety and crime prevention. The *Clery Act* also requires institutions to maintain a daily crime log that is available for public inspection, and to issue timely warnings and emergency notifications to provide up-to-date information about ongoing threats to the health and safety of the campus community. In addition, the *Clery Act* requires institutions to develop emergency response and evacuation plans. Institutions that maintain student residential facilities must also develop missing student notification procedures, and produce and distribute an Annual Fire Safety Report (AFSR) containing fire statistics and important policy information about safety procedures, fire safety and suppression equipment, and what to do in the case of a fire. Finally, the *Clery Act* amendments that were included in Section 304 of the Violence Against Women Reauthorization Act of 2013 went into effect on July 1, 2015. These provisions are aimed at preventing campus sexual assaults and improving the response to these crimes when they do occur.

The *Clery Act* is based on the premise that students and employees are entitled to accurate and honest information about the realities of crime and other threats to their personal safety and the security of their property. Armed with this knowledge, members of the campus community can make informed decisions about their educational and employment choices and can take active roles in their own personal safety and to secure and protect their personal property. For that reason, the office of Federal Student Aid (FSA) must ensure that the information disclosed in each ASR and AFSR is accurate and complete. FSA uses a multi-faceted approach to ensure that institutions comply with the *Clery Act*, which includes providing technical assistance and

training programs and materials, as well as monitoring and enforcement through program reviews.

FSA may initiate a campus crime program review as a result of a complaint or public reports about crimes and crime reporting and prevention at a particular institution. FSA has also conducted Quality Assurance Reviews in cooperation with the FBI's Criminal Justice Information Service (CJIS) Audit Unit. Program reviews entail in-depth analyses of campus police and security records and interviews with institutional officials, crime victims, and witnesses. During a program review, an institution's policies and procedures related to campus safety matters are also examined to determine if they are accurate and meet the needs of the campus community.

Because more than 90% of serious campus crimes are alcohol and drug-related, the Secretary of Education delegated oversight and enforcement responsibilities for the Drug-Free Schools and Communities Act (*DFSCA*), in §120 of the HEA, *20 U.S.C. §1011(i)*, to FSA. The *DFSCA* requires all institutions of higher education that receive Federal funding to develop and implement comprehensive drug and alcohol abuse prevention programs (DAAPP) and to certify to the Secretary that these programs are in place. The programs must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

On an annual basis, each institution must provide a DAAPP disclosure to all current students (including all students enrolled for any type of academic credit, except for continuing education units) and to all current employees that explains the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse, as well as information about available counseling, treatment, and rehabilitations programs, including those that may permit former students or employees to return following expulsion or firing. The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll after the initial distribution and to employees who are hired at different points throughout the year.

Finally, the *DFSCA* requires an institution to conduct a biennial review to determine the effectiveness of its DAAPP in identifying areas requiring improvement or modification and assessing the consistency of enforcement actions imposed on students and employees that are found to be in violation of applicable Federal, state, and local drug and alcohol-related statutes or ordinances and/or institutional policies and codes of conduct.

Proper implementation of the *DFSCA* provides students and employees with important information about the detrimental consequences of illicit drug use and alcohol abuse. The conduct of a meaningful biennial review provides the institution with quality information about the effectiveness of its drug and alcohol programs. Any failure to implement these requirements may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime. The *DFSCA* is monitored and enforced by the Department.

B. Institutional Information

Green River College
12401 SE 320th Street
Auburn, WA 98092-3622

Control Structure: Public

Highest Level of Offering: Baccalaureate Degree

Accrediting Agency: Northwest Commission on Colleges and Universities

Student Enrollment: 8,500 (Approx. F/T, For-Credit, Fall 2017)

Percentage of Students Receiving Title IV Funds: 20% (Approx. Fall 2017)

Title IV Participation¹

2016-2017 Award Year

William D. Ford Federal Direct Loan Program (FDLP)	\$ 5,568,253
Federal Pell Grant Program	\$ 7,011,438
Federal Supplemental Education Opportunity Grants	\$ 291,219
Federal Work-Study Program	\$ 292,324
Total	<u>\$13,163,234</u>

FDLP Cohort Default Rates

2014: 17.1%

2013: 16.6%

2012: 17.3%

¹ Source: Postsecondary Education Participants System (PEPS).

The Institution

Green River College (GRC; the College) was founded as Green River Community College in 1963. Classes were first offered in the Fall Semester of 1964. The main campus is situated on 180 acres in Auburn, Washington's Lea Hill neighborhood. Student housing has been available on the main campus since 2004. The full-time student population at the main campus is approximately 8,500. The College also enrolls more than 10,000 part-time students. Branch campuses are located in downtown Auburn, Kent, and Enumclaw, Washington.

The GRC Campus Safety Department is comprised of non-sworn, public safety officers, all of whom are licensed through the State of Washington and contracted through Pierce County Security, a private firm. The members of the safety staff are not authorized to carry firearms or to make arrests; rather, when necessary, Campus Safety personnel request the assistance of local law enforcement agencies, primarily the City of Auburn Police Department (APD). The Director of Campus Safety and Transportation, who oversees safety operations, is a full-time GRC staff member.

C. Background and Scope of Review

The U.S. Department of Education (the Department) conducted the site visit phase of the program review at GRC from November 16, 2015 to November 20, 2015. The review was conducted by the Clery Act Compliance Division and was led by Mr. Keith Ninemire.

The focus of the review was to evaluate GRC's compliance with the *Clery Act* and the *DFSCA*. The review was initiated following a careful assessment of credible complaints that alleged that the College violated multiple provisions of the *Clery Act*. Specifically, the complainants charged that GRC did not produce ASRs from 2008 through 2013 or AFSRs from 2010 through 2013. The complainants also claimed that the College failed to properly compile and disclose campus crime statistics in accordance with *Clery Act* offense classifications and geographical parameters, among other allegations.

The Department reviewed the ASRs and AFSRs produced by GRC through 2015 and, in some cases, expanded the initial scope to include limited testing of certain compliance attributes of the College's Clery compliance program into calendar year 2016. The team also examined samples of GRC's incident reports and student and employee disciplinary records generated in the course of campus safety and disciplinary operations during the 2008 - 2015 timeframe. The review team also examined records from local law enforcement agencies. Both random and judgmental sampling techniques were used to select reports for this review. Approximately 663 incident reports were cross-checked against the daily crime log to assess whether crimes occurring on the College campus or its "Clery Geography" were properly entered into the daily crime log.

Disclaimer:

Although this review was planned and conducted in a thorough manner, neither the review nor this FPRD can be assumed to be all-inclusive. The absence of statements in this report concerning GRC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not

relieve the College of its obligation to comply with all of the statutory and regulatory provisions governing Title IV, HEA programs, including the *Clery Act* and the *DFSCA*.

Although official positions and offices are mentioned in this document, findings of violation are attributed solely to the College. GRC is ultimately responsible for complying with the *Clery Act* and other statutory and regulatory requirements and is responsible for the actions of its employees and agents. References to specific institutional officials are included solely to improve the clarity of the document.

D. Findings and Final Determinations

During the review, numerous areas of noncompliance were identified. This review brought to light a number of serious concerns about the College's campus safety and crime prevention programs as they relate to compliance with the *Clery Act* and with the *DFSCA*. The findings identified in the Department's September 25, 2017, Program Review Report (PRR) appear in italics below. GRC submitted its official response to the Department's report on November 20, 2017. A summary of GRC's response and the Department's Final Determination appear at the end of each finding. Please note that certain non-substantive edits were made to the text of the initial report.

Finding #1: Lack of Administrative Capability

Citation:

To begin and to continue to participate in any program authorized under Title IV of the HEA, an institution must demonstrate that it is capable of adequately administering the program under the standards established by the Secretary. Among other requirements, the Secretary considers an institution to have administrative capability if it administers the Title IV, HEA programs in accordance with all statutory provisions of, or applicable to, Title IV of the HEA, and all applicable regulatory provisions prescribed under that statutory authority. 34 C.F.R. §668.16(a). The Secretary's standards of administrative capability also require that an institution employ "an adequate number of qualified persons," as well as ensure that program activities are undertaken with appropriate "checks and balances in its system of internal controls." C.F.R. §668.16(b)(2); 34 C.F.R. §668(c)(1). An administratively capable institution "has written procedures for or written information indicating the responsibilities of the various offices with respect to . . . the preparation and submission of reports to the Secretary." 34 C.F.R. §668.16(b)(4). These standards apply to all aspects of the Title IV Program regulations, including the Clery Act.

Noncompliance:

GRC substantially failed to develop and implement adequate Clery Act and DFSCA-compliant programs during the review period. The overall compliance program evidenced a lack of supervisory oversight, and responsible officials were largely unaware of their obligations to ensure substantive compliance with the Clery Act and DFSCA.

The regulations that govern the Title IV, Federal Student Aid programs establish certain standards that all participating institutions must maintain to be considered administratively capable. The findings detailed in this report indicate multiple deficiencies and weaknesses in

GRC's internal control structure and overall compliance program during the review period. The identified violations are interrelated and show that GRC failed to compile and disclose accurate and complete crime statistics, to develop and implement adequate campus safety and crime prevention policies and procedures, to formulate and enforce a substantive drug and alcohol abuse prevention program, and to otherwise ensure that the requirements of the Clery Act and the DFSCA were followed. Moreover, the review team identified several contributing factors that further compromised GRC's campus safety operations, including, but not limited to, a persistent failure to adequately train staff and ensure that they understood the responsibilities conferred upon them by Federal law, and to ensure the requisite communication, coordination, and supervision of campus safety and compliance functions. The consequences of these preventable failures are serious as they contributed to the general failure to inform students, employees, and other stakeholders about the realities of crime on GRC campus and in the near-campus community.

The findings detailed in this PRR indicate that GRC failed to develop and implement an adequate system of internal controls that contributed to the Clery Act and DFSCA compliance failures that occurred during the review period, which encompassed 2008 through 2014. The evidence reviewed by the Department shows that GRC failed to comply in numerous ways, as detailed in the findings of this report. The evidence also demonstrates that GRC employees and contractor staff did not receive adequate trainings in Clery Act compliance, and that the College failed to exercise sufficient oversight, governance, and coordination of those College officials and departments that were responsible for campus safety, student and employee conduct, and the delivery of other safety-related services. The result of these breakdowns was a general failure to keep students, employees, other stakeholders, and the larger campus community informed of crime and other threats to their safety and security.

Specifically, as will be detailed later in this report, under "Finding #8," the College, in logging its crimes, used a homegrown system that required the safety officer who was using it to select the location of the crime from a drop-down menu. This drop-down menu included all of the buildings on campus, with a separate category for off-campus. However, the menu failed to include a selection for public property. And, as public property was not an option, safety officers consistently selected "off campus" for all those crimes that took place on public property. This deficiency was, at least in part, responsible for the College's failure to provide accurate and complete campus safety and crime prevention information to the students, employees, parents, and other stakeholders, including the Secretary.

Additionally, the evidence developed and examined by the Department indicated that GRC specifically failed to do the following: 1) compile and disclose accurate, complete, and fully-reconciled crime statistics; 2) maintain an accurate and complete daily crime log; 3) develop and then adhere to required campus safety and crime prevention policies and procedures; 4) develop and implement effective drug and alcohol abuse prevention programs; 5) produce and distribute ASRs from 2008 through 2013; and 6) produce and distribute AFSRs from 2010 through 2013. The College also failed to identify its CSAs, advise them of their crime-reporting obligations, and provide them with a simplified means to report offenses for inclusion in the annual statistics. Such failures call GRC's ability and/or willingness to properly administer the Title IV, HEA, Federal Student Aid programs into serious question.

For the above reasons, the Department finds that GRC lacked the ability and/or willingness to properly administer the Title IV Federal Student Aid programs in accordance with its Program Participation Agreement (PPA). Compliance with the Clery Act, the DFSCA, and the Department's regulations are specifically required by the terms and conditions of GRC's PPA under which the College participates in the Title IV, HEA Federal Student Aid programs. The College's current PPA was executed on December 03, 2012, and is effective through June 30, 2018. This PPA was signed by former President Eileen Ely. The PPA requirements can be found at 34 C.F.R. §668.14(c).

Administrative impairments, such as those identified during this program review, increase the likelihood that the statutes and regulations that govern the Title IV programs will not be followed. With regard to the Clery Act, such impairments may result in an institution's systemic failure to provide students and employees with accurate and important campus crime information and services that are essential to their safety and security. Impaired administrative capability and weak internal controls are an indication that an institution lacks the ability or willingness to comply with Federal regulations.

Required Action:

As a result of this violation, GRC is required to take all necessary corrective actions to cure the violations identified in this PRR and to adequately address the organizational weaknesses that contributed to these violations. In addition, the College is required to develop and implement a system of policy and procedural improvements to ensure that these findings do not recur. As part of that process, the College will be required to develop and implement a comprehensive remedial action plan.

The College must conduct an institutional self-study of its Clery Act compliance during calendar years 2015 through 2017. GRC must appoint an institutional official with sufficient knowledge and authority to coordinate the self-study and act as the point of contact for the review team. The self-study must include a comprehensive review of campus security policies and procedures with specific attention to the following:

- *Identification of reportable incidents;*
- *Classification of criminal incidents;*
- *Collection, compilation, and disclosure of crime statistics;*
- *Identification and coordination of and communications with CSAs;*
- *Coordination of and communications with the local law enforcement agencies that have concurrent jurisdiction;*
- *Production and distribution of the ASR;*
- *Production and distribution of the AFSR;*
- *Issuance of timely warnings and emergency notifications;*
- *Maintenance of the daily crime log; and*
- *Compliance with all aspects of the DFSCA and the Department's Part 86 regulations.*

At the conclusion of the self-study, the College must prepare a detailed report of its findings and submit it to the Department as part of its official response.

Based on an evaluation of all available information, including GRC's response, the Department will determine appropriate additional actions and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and acknowledged serious deficiencies in its campus safety and crime prevention policies, procedures, and programs. Specifically, the College acknowledged a general lack of adequate program development, supervisory oversight, training initiatives, and internal controls during the review period. Notwithstanding these admissions, GRC also registered its disagreement with the finding to the extent that it suggested a possible lack of willingness on the part of the College to comply with Federal regulations.

Final Determination:

In Finding #1, the Department found that GRC lacked the administrative capability required of all Title IV participating institutions in that it had substantially failed to comply with the *Clery Act* and the *DFSCA* throughout the review period, as outlined in the Noncompliance section above. This finding was based on the College's systemic and persistent failure to develop and implement adequate campus safety, crime prevention, fire safety, and substance abuse prevention compliance programs. This determination is supported by the serious, persistent, and systemic violations of the *Clery Act*, the HEA fire safety requirements, and the *DFSCA* that were noted throughout the PRR. The regulations governing the Title IV, Federal Student Aid programs establish certain standards that all participating institutions must maintain to be considered administratively capable. To begin or continue to participate in any Title IV, HEA program, an institution must demonstrate that it is capable of adequately administering that program by substantially complying with all statutory and regulatory requirements, including the campus crime, fire safety, and substance abuse prevention requirements.

During the review period, GRC did not have an effective internal control structure or an adequate communication and coordination strategy to facilitate minimally-acceptable levels of compliance. The administrative impairments identified by the review team are outlined in the Noncompliance section above and throughout the PRR. Specifically, the review team found that the College substantially and persistently failed to: 1) compile and disclose accurate, complete, and fully-reconciled crime statistics; 2) maintain an accurate and complete Daily Crime Log and Fire Log; 3) develop, implement, and disclose required campus safety, crime prevention, and fire safety policies and procedures; and, 5) develop and implement effective drug and alcohol abuse prevention programs. The College also failed to identify its Campus Security Authorities (CSAs), advise them of their crime-reporting obligations, and provide them with a simplified means to report offenses.

The number and extent of the violations identified in the initial report and stressed in this FPRD support the Department's determination that GRC failed to establish an adequate system of checks and balances, and failed to create an environment of basic internal controls during the review period. Furthermore, it is now clear that the Department's review was the impetus for

most of the remedial steps that were eventually taken, and that, but for the Department's intervention, it is unlikely that the College would have undertaken many of these efforts to address these longstanding deficiencies. The compliance concerns noted during the review period were significant enough to call GRC's ability and /or willingness to properly administer the Title IV, Federal Student Aid programs into serious question.

To address these administrative impairments, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs, and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, GRC concurred with the finding and asserted that extensive remedial action had been undertaken, over several months, to address the very conditions that were identified during the review.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review and the College's admissions, the Department has determined that the violations identified in the initial finding are hereby sustained. The Department's examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's responsive documents, including the 2017 ASR/AFSR and its new and revised internal policies and procedures. The College's assertions about its remedial efforts and its new and revised internal guidance suggest that a program of reforms has been developed. The Department's review suggests that if this plan is, in fact, fully implemented, enforced, and sustained, it should provide reasonable assurances that these types of deficiencies will not recur. As such, the Department has determined that the College's remedial action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC are put on notice that they must continue to develop the College's campus safety program and take any additional necessary action to fully address the deficiencies and weaknesses identified by the Department as well as any other deficiencies or weaknesses that were identified by the institution during the preparation of its response, or by any other means. This requirement applies to this Impaired Administrative Capability finding and to all other others noted in the PRR and this FPRD.

GRC is reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the *Clery Act*, HEA fire safety requirements, and the *DFSCA*, as required by its PPA. Nevertheless, GRC officials must understand that any failure to administer the Title IV, FSA programs in accordance with Federal Law and the Department's regulations triggers a special concern for the Department and, more importantly, serves to deprive students and employees of important campus safety information to which they are entitled. For these reasons, the College is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #2: Failure to Produce and Distribute Annual Security Reports in 2008, 2009, 2010, 2011, 2012 and 2013

Citation:

The Clery Act and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees a comprehensive ASR that contains, at a minimum, all of the statistical and policy elements enumerated in 34 C.F.R. §668.46(b). With the exception of certain drug and alcohol program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements. §485(f) of the HEA; 34 C.F.R. §668.46(b).

The ASR must be published and actively distributed as a single document. Acceptable means of delivery include U.S. Mail, hand delivery, campus mail distribution to the individual, or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. §668.41(e)(1). These regulations also require institutions to provide a notice containing this information to all prospective students and employees. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. 34 C.F.R. §668.41(e)(4).

An institution's ASR must include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide, certain sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistics for certain hate crimes, arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs, as well as the illegal usage of controlled substances, liquor, and weapons also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and 4) certain adjacent and accessible public property. 34 C.F.R. §668.46(c)(1). When applicable, an institution must also compile and publish separate crime statistic disclosures for each of its campuses. 34 C.F.R. §668.46(d).

The ASR also must include several policy statements. These disclosures are intended to inform the campus community about the institution's security policies, procedures, and the availability of programs and resources, as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the ASR itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions must also provide detailed policies of the issuance of timely warnings, emergency notifications, and evacuation procedures. As noted above, all required statistics and policies must be included in a single comprehensive document. 34 C.F.R. §668.46(b)(2).

Finally, each institution must also submit campus crime statistics for inclusion in the Department's "Campus Safety and Security Data Analysis Cutting Tool" (CSSDACT). 34 C.F.R. §668.41(e)(5).

Noncompliance:

GRC failed to produce ASRs in 2008, 2009, 2010, 2011, 2012, and 2013. This failure also caused the College to violate the ASR active distribution and notification requirements for the same years cited above.

During an interview with the now former Director of GRC's Campus Safety office, the review team was advised that the College produced and distributed its first ASR in 2014. This report, entitled "The 2013-2014 Annual Security, Safety, and Fire Report," was distributed on October 1, 2014. Based on this information and the lack of any documentation to the contrary, the Department finds that GRC never met its ASR active distribution and notification requirements prior to its 2014 ASR. Additionally, the Department requested copies of the College's ASRs for the time period of 2008 through 2014; in response, the College was only able to produce the 2014 ASR for the program review. Moreover, the Department must point out that, after nominally meeting these requirements in 2014, GRC, once again, failed to comply with basic ASR standards in 2015, as detailed later in this report.

The Clery Act is, first and foremost, a consumer protection law based on the premise that students, employees, and other stakeholders are entitled to accurate and complete campus safety and crime prevention information. The transparent communication of this information empowers campus community members to be well-informed and to play active roles in their own safety and security. Any failure to produce an accurate and complete ASR and to actively distribute the report in accordance with Federal regulations deprives the campus community of vital campus safety information to which they are entitled and effectively negates the law's intent.

Required Action:

As a result of these violations, GRC is required to take all necessary corrective actions to address these deficiencies and the conditions that led to them. Specifically, the College must review and revise its current policies and procedures that govern the production and distribution of all future ASRs and develop and implement additional internal guidance as needed to provide reasonable assurance that all campus safety operations will be carried out in accordance with the Clery Act going forward and that these violations will not recur. The new procedures must specifically articulate how prospective students and employees will be notified about the report's availability. A copy of these new revised policies and procedures must be provided with the College's response to this PRR.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management stated its concurrence with the finding, and acknowledged that the College failed to produce and distribute ASRs in 2008, 2009, 2010, 2011, 2012, and 2013. The College claimed that responsible officials were apparently under the impression that submitting crime data annually to the Department's CSSDACT was enough to comply with Federal regulations.

Final Determination:

Finding #2 cited GRC for its failure to produce ASRs in 2008, 2009, 2010, 2011, 2012, and 2013, as outlined in the Noncompliance section above. This failure also caused the College to violate the ASR active distribution and notification requirements for these same years. As a result of this violation, Green River College was required to revise its policies and procedures related to production and distribution of its future ASRs and to implement new policies and procedures that will provide reasonable assurance that these violations will not recur. In its response, GRC concurred with this finding, described the remedial actions it had taken, and submitted documentation in support of its claims.

The Department carefully reviewed all available information, including GRC's narrative response and supporting documentation. Based on that review and the College's admissions, all of the violations identified in the initial finding are sustained. The review team's examination also showed that the identified violations were, for the most part, satisfactorily addressed by the College's eventual amendments and revisions to its prior reports, its combined 2017 ASR/AFSR and evidence of distribution, and its new and revised internal policies and procedures. As such, the Department has determined that GRC's remedial action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review.

However, the officials and directors of GRC are put on notice that the College must continue to refine its ASRs and continue to develop its campus safety and crime prevention operation. Moreover, the institution must initiate any other action that may be needed to fully address the deficiencies and weaknesses identified by the Department. These remedial measures must also address any deficiencies that were identified during the preparation of the College's response or as otherwise needed to ensure that these violations do not recur.

GRC is reminded that the exceptions identified here constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The production and distribution of an accurate and complete ASR is the most basic and foundational requirement of the *Clery Act* and is an essential part of a compliant campus safety and crime prevention program. The availability of accurate and complete safety information enables interested campus community members and their families to make well-informed decisions about where to study and work, and empowers individuals to play a more active role in their own safety and security. GRC has stated that it has brought its overall campus safety operations program into compliance with the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that such actions cannot and do not diminish

the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #3: Failure to Produce and Distribute Annual Fire Safety Reports in 2010, 2011, 2012 and 2013

Citation:

As of October 1, 2010, the HEA and the Department's regulations require that all institutions that receive Title IV, HEA funds and maintain an on-campus student housing facility must, by October 1 of each year, prepare, publish, and distribute to its current students and employees, through appropriate publications and mailings, an AFSR that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. §668.49(b). These institutions must disclose fire statistics for each on-campus student residential facility for the three most recent calendar years. An institution's statistics must accurately and completely identify the number of on-campus fires and the cause of each fire, the number of persons who sustained fire-related injuries that resulted in treatment at a medical facility (including on-campus health centers), the number of fire-related deaths, and the dollar value of property damage caused by such fires. 34 C.F.R. §668.49(c).

In addition, the AFSR must include several fire safety information disclosures covering topics such as the type(s) of fire safety systems that are used in each student housing facility, the number of fire drills that were conducted during the previous calendar year, any institutional policies, procedures, and programs regarding: 1) the use and/or possession of portable electrical appliances; 2) smoking and the use/presence of open flames in student housing facilities; 3) evacuation procedures to be followed in the case of a fire; 4) fire safety education and training programs; 5) the institutional official(s) and departments to whom students and employees should report the occurrence of fires so that those incidents can be included in the institution's annual fire statistics; and 6) any plans for future improvements to the institution's fire safety program. 34 C.F.R. §668.49(b).

The AFSR must be published and distributed as a materially-complete, comprehensive publication. If an institution chooses to combine the ASR and AFSR and publish them as a single document, then the title of both reports must conspicuously appear on the cover page. Acceptable means of delivery include U.S. Mail, hand delivery, campus mail distribution to the individual, or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all current students and employees that includes a direct link to each report (with the exact electronic address), a description of its contents, and an advisement that a paper copy will be provided upon request. The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the AFSR's availability, the content of each report, and the exact electronic address of each report, if posted to an internet or intranet site. This notice must also advise interested parties how to obtain a paper copy of the AFSR.

Finally, an institution is required to submit its campus crime and fire statistics to the Secretary on an annual basis. 34 C.F.R. §668.41(e)1)-(6).

Noncompliance:

GRC failed to produce ASFRs in 2010, 2011, 2012, and 2013. This failure also caused the College to violate the AFSR active distribution and notification requirements for the same years cited above. During an interview with the now former Director of GRC's Campus Safety office, the review team was advised that the College attempted to comply with the AFSR requirement for the first time in 2014. In that year, GRC produced a report, entitled "The 2013-2014 Annual Security, Safety, and Fire Report," that was distributed to required recipients on October 1, 2014. Based on this information and the complete lack of any documentary record to the contrary, the Department finds that GRC never met its AFSR active distribution and notification requirements prior to its 2014 AFSR. Moreover, the Department must point out that, after nominally meeting these requirements in 2014, GRC, once again, failed to comply with basic ASR standards in 2015, as detailed later in this report.

Failure to produce an accurate and complete AFSR, and to actively distribute it to students and employees, deprives interested persons of important fire safety information to which they are entitled. Access to this information permits campus community members, especially those who live in campus housing, to make well-informed decisions and empowers them to play more active roles in their own safety and security.

Required Action:

As a result of these violations, GRC must develop and implement policies and procedures that will govern the production and distribution of future AFSRs and ensure that all facets of the process are carried out in a manner that meets the HEA requirements. The procedures must also specifically articulate how prospective students and employees will be notified of the report's availability. A copy of these new revised policies and procedures must be provided with its response to this PRR.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and stated that fire safety is a top priority for the College. GRC also asserted that, starting in 2014, it began producing a combined ASR/AFSR document. Per that response, the 2014 combined report was distributed in September of that year and was actively distributed in advance of the October 1 due date.

Final Determination:

Finding #3 cited GRC for its failure to produce AFSRs in 2010, 2011, 2012, and 2013, as outlined in the Noncompliance section above. This failure also caused the College to also violate the AFSR active distribution and notification requirements for these same years. As a result of these violations, GRC was required to revise its policies and procedures related to production and distribution of its future AFSRs and implement new policies and procedures that will provide reasonable assurance that these violations will not recur. In its response, GRC concurred with this finding, described the remedial actions that it had taken, and submitted documentation in support of its claims.

The Department carefully reviewed all available information, including the College's narrative response and supporting documentation. Based on that review, and GRC's admissions, all of the violations identified in the initial finding are sustained. The review team's examination also showed that the identified violations were, for the most part, satisfactorily addressed by the College's eventual amendments and revisions to its prior reports, its 2017 ASR/AFSR and evidence of distribution, and its new and revised internal policies and procedures. As such, the Department has determined that GRC's remedial action plan meets minimum requirements. For these reasons, the Department has accepted the response and considers this finding to be closed for the purposes of this Program Review. However, the officials and directors of GRC are put on notice that the College must continue to refine its AFSRs and continue to develop its campus safety and crime prevention operation. Moreover, the institution must initiate any other action that may be needed to fully address the deficiencies and weaknesses identified by the Department. These remedial measures must also address any deficiencies that were identified during the preparation of the College's response or as may be otherwise needed to ensure that these violations do not recur.

GRC is reminded that the exceptions identified here constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The production of an accurate and complete AFSR is one of the most basic requirements of the *Clery Act*, and is an essential part of a comprehensive campus safety and crime prevention program. Accurate and complete fire safety information enables interested campus community members and their families to make well-informed decisions about where to study and work and empowers individuals to play a more active role in their own safety and security. GRC has stated that it has brought its overall campus safety operations program into compliance with the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that such actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #4: Failure to Distribute the 2015 ASR within Regulatory Timeframes

Citation:

The Clery Act and the Department's regulations require that the ASR be published and actively distributed as a single document. Acceptable means of delivery include U.S. Mail, hand

delivery, campus mail distribution to the individual, or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees, that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. §668.41(e)(1). These regulations also require institutions to provide a notice containing this information to all prospective students and employees. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. 34 C.F.R. §668.41(e)(4).

Noncompliance:

GRC failed to distribute its 2015 ASR on or before October 1, 2015. Instead, the College distributed its report on November 17, 2015, 57 days late. This finding triggers a special regulatory concern for the Department because, after a single year of minimal compliance in 2014, the College slipped back into its longstanding pattern of persistent ASR-related deficiencies, as noted throughout this PRR.

The timely dissemination of campus safety and crime prevention information through the ASR is a foundational requirement of the Clery Act. Any failure to produce or actively distribute an accurate and complete ASR in accordance with Federal regulations delays and therefore, deprives access to this important information and effectively negates the law's intent.

Required Action:

As a result of this violation, GRC must review and revise its policies and procedures to ensure that its ASRs are actively distributed to all enrolled students and current employees, each reportable year, by the October 1 deadline. Additionally, it must develop policies and procedures to ensure that all prospective students and employees are actively notified in a conspicuous manner about the availability of the ASR and AFSR. The College is also reminded that, if its ASR and AFSR are to continue to be produced and distributed as a combined report, the title page must clearly state that the publication contains both the ASR and the AFSR.

Finally, GRC must submit a copy of these new and revised policies and procedures as part of its response to this PRR. The College must also provide a certification statement attesting to the fact that the 2017 ASR and AFSR were actively distributed in accordance with the Clery Act. This certification must affirm that GRC understands all of its Clery Act and HEA obligations and that it has taken all necessary corrective actions to reasonably ensure that this violation, and the others identified in this report, will not recur.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding, stating that remedial action had been taken as directed in the Department's PRR. The College also claimed that its corrective efforts will prevent future violations.

Final Determination:

Finding #4 cited GRC for its failure to distribute its 2015 ASR/AFSR by October 1, 2015, as outlined in the Noncompliance section above. The review team discussed this matter in detail with the Interim Director of Public Safety. This official asserted that the 2015 ASR/AFSR was produced in advance of the Department's site visit and indicated that the document was completed in "late October of 2015." The review team also determined, however, that the report was not distributed until November 27, 2015, 57 days after the due date for distribution. The Interim Director acknowledged the delayed distribution, but claimed that he wanted to review the report with the Department's team prior to distribution, in an apparent effort to ensure its accuracy and completeness. As a result of this violation, the College was required to review and revise its internal policies and procedures related to the distribution of its ASRs/AFSRs to ensure that these violations do not recur. In its response, the College concurred with the Department's findings, stating that remedial action had been taken and submitting documents in support of its claim. Furthermore, it provided evidence of its timely distribution of its 2016 ASR/AFSR.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's admissions, the Department has determined that the violation identified in the initial finding is sustained. In upholding this finding, the Department must note that there is no provision in statute or the Department's regulations that provides for any extension to the due date for distribution of the ASR or AFSR, except as explicitly provided for in the case of a natural disaster or other specified emergency. The Department's examination also indicated that the identified violation was, for the most part, satisfactorily addressed by GRC's submission of evidence showing timely distribution of recent reports and the College's new and revised policies and procedures. As such, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. As noted throughout this FPRD, the timely distribution of accurate and complete ASR and AFSRs is a foundational provision of the *Clery Act* and the HEA fire safety requirements. Any failure in this regard deprives students and employees of timely access to important campus safety, crime prevention, and fire safety information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so,

it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #5: Failure to Actively Notify Prospective Students of the College's 2014 and 2015 ASRs and AFSRs

Citation:

The HEA, the Clery Act and the Department's regulations require institutions to actively notify prospective students and employees about the availability of the ASR and AFSR. Said notice must include a description of report's contents and information on how to obtain a copy of the document. Additionally, an institution must provide its ASR and AFSR, upon request, to prospective students or prospective employees. 34 C.F.R. §668.41(e)(4).

Noncompliance:

GRC failed to provide active notification to prospective students about the availability of its ASRs and AFSRs in 2014 and 2015. During the course of this review, Department officials requested copies of any notices sent to prospective students. A review of the documents provided by the College revealed no information or notice to prospective students in reference to the 2014 and 2015 reports. The review team was able to determine that adequate notices about the 2014 and 2015 ASR and AFSRs were provided to prospective employees through job announcements.

The Clery Act requires the transparent and timely dissemination of campus safety and crime prevention information to all campus community members, including prospective students and employees. This information can empower individuals to be better informed and to play active roles in their own safety and security. Failure to notify prospective students and employees about the availability of the ASR and the AFSR compromises the intent of Clery Act and constitutes a violation of Federal law.

Required Action:

As a result of these violations, GRC must develop and implement policies and procedures that specifically articulate how prospective students will be notified of the availability of future ASRs and AFSRs. A copy of these policies and procedures must be included in the College's response to this PRR.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in the FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and conceded that the College had failed to properly and actively notify prospective students about the 2014 and 2015

combined ASR/AFSRs. GRC also claimed that it has since implemented new policies and procedures to prevent reoccurrence of this violation.

Final Determination:

Finding #5 cited GRC for its failure to actively notify prospective students about the availability of its ASRs and AFSRs for the calendar years of 2013 and 2014. As the result of these violations, the College was required to review and revise its internal policies and procedures related to the notification of its ASRs/AFSRs to prospective students to ensure that these violations do not recur. In its response, the College concurred with the Department's findings, stating that remedial action had been taken, and submitted documents in support of its claim.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review and the College's admissions, all of the violations identified in the initial finding are sustained. In upholding this finding, the Department notes that neither GRC's publications that are typically provided to prospective students nor the areas of the website that include information for future students included any information about the ASR or AFSR. The College conceded this point during the site visit and in its response.² The Department's examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's responsive documents, including its new and revised policies and procedures. As such, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The requirement to actively notify prospective students and employees about the availability of the ASR and AFSR is a foundational requirement of the *Clery Act* and its campus safety goals. Any failure in this regard deprives students and employees of important campus safety, crime prevention, and fire safety information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

² In point of fact, the most persuasive support for this finding is the undisputed fact that the College did not produce ASRs or AFSRs for the majority of the review period. Logic dictates that the production of these required reports is a necessary precursor to including a notice about their existence in official publications or posting advisories to that effect on its website.

Finding #6: Failure to Properly Request Crime Statistics from Local Law Enforcement Agencies

Citation:

In complying with the statistical reporting requirements, an institution must make a reasonable, good-faith effort to obtain statistics from law enforcement agencies and state police agencies for crimes that occur on or within its "Clery Geography." 34 C.F.R. §688.46(c)(11)

Noncompliance:

GRC failed to properly request information regarding incidents of crimes that were reported to local law enforcement, specifically, the Auburn Police Department. The review team found that the College made the following errors in its request for crime statistics information needed for its 2015 and 2016 ASRs:

The 2015 ASR: The Campus Safety Official made two mistakes when requesting crime statistics for the 2014 calendar year.

- *First, he only requested that the local law enforcement agency provide the College with the numbers of crimes without any identifying information. The police agency responded by informing the College of the number of burglaries, robberies, and weapons offenses, without providing any other identifying information about those crimes, such as the incident report numbers, location, and dates of those crimes. Without the dates, locations, and other identifying factors, the Campus Security Office was not be able to discern which crimes it had accounted for in its crime log from those that it had not recorded. Evidence of this inquiry can be found in Exhibit A of this PRR.*
- *Second, the Campus Safety Official requested the number of crimes that took place from October 1, 2013 to September 23, 2015, without asking for any other identifying information. Again, as a result, the police agency returned the total numbers of crimes for that time period, without providing any identifying information such as the incident report numbers, location, and dates of those crimes. Thus, the College was not able to identify which of the crimes provided were to be counted within the 2014 calendar year and which were not to be included. Evidence of this inquiry can also be found in Exhibit A of this PRR.*

Regarding the 2016 ASR:

- *The Campus Safety Official only requested that the Auburn Police Department provide the total number of crimes by category, without any identifying information for each crime. By doing so, the information provided failed to allow the Campus Security Office to accurately discern the crimes that it had already accounted in its crime log from those that had not yet been counted. Evidence of this inquiry can be found in Exhibit A of this PRR.*

- *In addition, the College failed to maintain audit trails or other records evidencing the manner in which it determined the particular crimes to be included in its reports to the campus community and the Department from 2008 through 2014. A record of this kind provides accountability and helps to ensure the accuracy of those crimes reported by the institution and local law enforcement agencies. This combined total number of crimes is then, in turn, reported out through the College's ASR and submitted to the Department in its Annual Survey Report. Without some sort of an audit trail, the College is unable to substantiate the numbers that it reports in its ASRs and in the CSSDACT.³*

Failure to compile and disclose accurate and complete crimes statistics and to include this information in the institution's ASR and in the statistics reported to the Department violates the Clery Act and the College's PPA.

Required Action:

As a result of these violations, GRC must develop and implement policies and procedures that will govern the preparation of its requests for crime statistics from local law enforcement agencies and the preparation of its audit trails, which may then be used to verify the crime statistics included in its ASR and for the Department's Annual Survey. A copy of the College's 2015 and 2016 comprehensive audit trails are required in its response to this PRR.

Furthermore, the College must submit copies of its correspondence and its requests for crimes statistics from local law enforcement agencies for the 2016 calendar year, along with the responses that it received. The responses from local law enforcement must provide sufficient information to enable the College to determine which crimes reported, if any, have been duplicated in its crime log and those crimes that still need to be added to their crime statistics.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management partially concurred with this finding. Specifically, the College agreed that it failed to properly request crime statistics from local law enforcement agencies in 2015.⁴ However, GRC contended that it did, in fact, properly request crime data for at least some of its buildings and properties in calendar year 2016. Per the response, the addresses that were not covered by the data request issued to the APD were all on the main

³Due to serious indicators of noncompliance identified during the fieldwork and subsequent analysis conducted prior to the issuance of the PRR, the team expanded the review's scope to include testing of additional compliance attributes, primarily related to the ASR/AFSR, into calendar year 2016.

⁴The title of the ASR/AFSR that GRC produced in 2015 identified it as the "Annual Safety and Fire Report" for 2014. Federal regulations do not require institutions to follow a standard naming convention for their ASRs and AFSRs. It should be noted, however, that the common industry practice is that the title of the report should indicate the year that the report was produced and distributed, not the most recent year for which statistical data is included therein.

campus. Officials claimed that this omission was “an inadvertent error” and that new procedures have been put in place to prevent recurrence of this condition.

Final Determination:

Finding #6 cited GRC for its failure to properly request, compile, and disclose statistics of incidents of crime reported to local law enforcement agencies in calendar years 2015 and 2016, as outlined in the Noncompliance section above. Specifically, the review team found that, in an apparent attempt to remedy past deficiencies related to its requests for and disclosure of statistics from the APD in advance of the Department’s site visit, the College requested statistics for crimes that were reported as having occurred near its main campus for the period of October 2013 through September 23, 2015; however, the College then failed to properly present this crime data in its ASRs. Additionally, GRC did not request sufficient information from local law enforcement agencies to identify incidents that may have already been documented in the College’s records and the resultant statistical compilation. The failure to collect specific, identifying details about these crimes deprived the College of information that would have allowed it to ascertain that certain offenses had already been counted, thereby reducing the likelihood that any incidents would be counted more than once, either in the statistical disclosure, the institution’s crime log, or both.

In collecting the crime statistics for the calendar year 2016, the College, once again, failed to collect specific, identifying information that would have allowed it to avoid this type of duplication. Rather, the College simply asked for the total number of crimes without requesting corresponding incident numbers or other identifying information. Additionally, the College admitted that it somehow failed to collect 2016 crime statistics for its main campus from the APD.

As a result of these violations, the College was required to develop and implement policies and procedures that will govern the preparation of its requests for crime statistics from local law enforcement agencies and in the preparation of its audit trails. Initially, the College failed to submit copies of audit trails for calendar years 2015 and 2016. Once the College compiled this data, it discovered that additional crimes needed to be added to the crime statistics that had been originally collected and disseminated for the 2015 and 2016 years. On December 21, 2017, the College then revised its 2017 ASR to reflect the correct numbers, stating that it will forward the corrected statistics to OPE for inclusion in the CSSDACT; however, the College should note that it will need to, once again, revise its 2017 ASR once it receives the requested crime statistics for its main campus from the APD. As noted above, the College concurred with the majority of the violations identified in the finding. The institution also described its remedial action and submitted documents in support of its claims.

The Department carefully examined all available information, including GRC’s narrative response and supporting documentation. Based on that review, and the College’s partial admissions, all of the violations identified in the initial finding are sustained. The Department’s examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC’s responsive documents, including its new and revised policies, procedures, and protocols to properly request crime statistics from its local law enforcement agencies and to

produce complete and accurate audit trails. As such, the Department has determined that the College's corrective action plan meets minimum requirements and, for this reason, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The compilation and disclosure of accurate and complete statistics in the ASR and AFSR is an essential and foundational requirement of the *Clery Act* that serves the law's campus safety and transparency goals. Any failure in this regard deprives students and employees of important campus safety, crime prevention, and fire safety information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #7: Failure to Compile and Disclose Accurate and Complete Crime Statistics

Citation:

The Clery Act and the Department's regulations require institutions to compile and disclose statistics concerning the occurrence, on campus, of the following incidents: criminal homicide, certain sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, institutions are required to disclose arrests and disciplinary actions related to the violations of certain Federal or state drug, liquor, and weapons laws. 34 C.F.R. §668.46(c)(1).

The Department's regulations require that, for Clery Act reporting purposes, participating institutions compile crime statistics using the definitions of crimes provided in 34 C.F.R. Part 668, Appendix A to Subpart D and the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Hate Crime Data Collection Guidelines and Training Guide for Hate Crime Data Collection. 34 C.F.R. §668.46(c)(9).

Noncompliance:

GRC misclassified several incidents of crime during the review period. In the Department's sample of reported incidents, the review team found that the College had improperly classified 61 offenses (See Exhibit B). Several factors contributed to these deficiencies. For example, it was determined that several incident reports in the Department's sample that were labeled as "informational" clearly documented Clery-reportable crimes. Misclassification errors of this type, along with other compilation and tabulation failures, caused these and, most likely, many other offenses to not be included in the crime statistics that were to be included in the College's ASRs or in the data that was submitted to the Department for inclusion in the CSSDACT,

resulting in the dissemination of false information and the formation of a misleading view of crime on the campus and in the near-campus community. The College's burglary statistics offer another example of this condition: In 2014, GRC disclosed three burglaries; however, the review team found an additional 14 burglary offenses that were omitted from the statistics, primarily due to classification errors. When the review team asked GRC's Director of Security why the College's safety officers had failed to classify so many crimes correctly, he proffered that the errors were likely due to a lack of training.

By failing to accurately compile, classify, and tabulate criminal offenses, GRC produced ASRs that included crime statistics that created a false impression about the reality of crime on campus.

Failure to compile and disclose accurate and complete campus crime statistics violates one of the most foundational requirements of the Clery Act. Reporting violations of this type deprive interested parties of access to important campus safety information to which they are entitled and calls the College's ability and willingness to properly administer the Title IV, FSA program in to serious question.

Required Action:

As a result of these violations, GRC must develop and implement detailed policies, procedures, protocols, and training programs that will provide for the compilation, classification, and tabulation of accurate and complete crime statistics going forward. As part of this process, the College must provide training for security officers about the proper application of crime definitions, the preparation of incident reports, the review and the correction of incident reports, proper maintenance of the daily crime log, and basic Clery Act compliance. A copy of all revised policies and procedures regarding the reporting of incident reports and the classifications of Clery Act crimes, along with a copy of GRC's training plan and all training materials must accompany the College's response to this PRR.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the majority of the exceptions identified in the finding. Specifically, the College conceded that it had misclassified 57 of the 61 reported crime incidents that had been included in the statistical disclosures for calendar years 2012, 2013, 2014, and 2015. GRC contended that the remaining four incidents were classified properly. Finally, College officials conceded that a lack of training was a major contributing factor to its failure to properly classify incidents of crime.

Final Determination:

Finding #7 cited GRC for its failure to compile and disclose accurate and complete crime statistics for calendar years 2012, 2013, 2014, and 2015, as outlined in the Noncompliance

section above. Specifically, the review team found the general failure to properly classify incidents of crime reported resulted in the disclosure of statistics in its ASR, and reporting to the CSSDACT, that significantly understated the level of criminal activity on campus and in the near-campus community. As a result of these violations, the College was required to review, revise, and implement detailed policies, procedures, protocols, and training that will provide for the compilation, classification, and tabulation of accurate and complete crimes statistics going forward. In its response, the GRC substantially concurred with the finding and conceded that the review team was correct in its determination that the College had improperly classified 57 of the 61 incidents identified in the PRR. GRC defended its classification of the other four incidents. College officials also asserted that adequate remedial action was taken to prevent recurrence and submitted documents and other information in support of its claims.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's partial admissions, 57 of the 61⁵ violations identified in the initial finding are sustained. In four cases, the College challenged the review team's initial finding. Based on a reconsideration of the work papers and GRC's response, the Department has determined that following: 1) Report #1328 was not part of the review team's sample. It appears that this incident was properly classified as a case of Vandalism. The review team did, however, examine Report #1326 and accurately determined that this offense should have been classified as an incident of Fondling,⁶ and, as such, this offense should have been included in the annual statistical disclosure. 2) Reports #2725, #3599, and #4112 were properly classified by GRC as larceny offenses. In the first case, the likely suspect was an invitee. In the second and third, it appears that property was stolen from an open access area, one of which outdoors. 3) While Report #4211 clearly chronicled serious acts of assault, intimidation, and possibly stalking, the documented facts, on closer examination and in light of the additional information provided in the response, do not support a finding of sexual assault. Nevertheless, in light of allegations raised in the complaint that led to this review, the College is reminded that crimes described in Report #4211 required a timely and coordinated response to ensure that the victim was protected and advised of the full range of options that were available to her. GRC must ensure that adequate protective measures and other accommodations are in place to assist victims of crime, including assistance in reporting crimes to local law enforcement officials.

The Department's examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's responsive documents, including its new and revised policies, procedures, and protocols to produce complete and accurate crime statistics. As such, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the

⁵ As noted, Report #1328 was not part of the sample. This case number was inadvertently referenced in the initial finding. The review team did examine Report #1326 and determined that the incident was improperly classified as a case of Harassment.

⁶ As noted previously, Report #1326 was incorrectly classified as a case of Harassment. One of the two complainants in this case clearly indicated that the offender touched her breast without her consent (2008).

preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The collection, compilation, and disclosure of accurate and complete crime and fire statistics are fundamental to the law's goal of promoting campus safety through information and transparency. Any failure in this regard deprives students and employees of important campus safety and crime prevention information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #8: Failure to Properly Disclose Crime Statistics by Location

Citation:

The Clery Act and the Department's regulations require that reportable offenses must be disclosed by location in accordance with the definitions of "Clery Geography." Institutions must provide a geographic breakdown of the reported crime statistics according to the following categories: (i) on campus; (ii) of the crimes reported on campus, the number of crimes that took place in dormitories or other residential facilities for students on campus; (iii) in or on a non-campus building or property; (iv) accessible and adjacent public property. 34 C.F.R. §668.46(c)(5).

Noncompliance:

GRC failed to disclose statistics for incidents of crime that occurred on the public property that is accessible from and/or adjacent to its campus for the years 2008 through 2014. College officials attributed this violation to its use of a "homegrown" crime data collection system that required the safety officer to select the location of the crime from a drop-down menu. This drop-down menu included all of the buildings on campus and contained a category for off-campus property. However, the menu failed to include a selection for public property. Having no public property option, the safety officers, who were required to select a location in order to complete their incident reports, selected "off campus" for all those crimes that took place on public property. This violation and the numerous weaknesses in the College's systems and practices that led to it resulted in a persistent and widespread failure to provide accurate and complete crime statistics and other campus safety and crime prevention information to students, employees, parents, and other stakeholders, including the Secretary. During the course of its review, the review team identified 30 crimes in its sample of incident reports, crime logs, and police reports that were not included in its 2008-2014 ASRs or submitted to the Department's CSSDACT during that same time period.⁷ By failing to capture and disclose all reportable

⁷ See Exhibit C for further information.

crimes, the ASRs produced by GRC during the review period actually served to create a false view of campus safety that runs counter to the very intent of the Clery Act.

Required Action:

As a result of these violations, GRC must review all relevant property (buildings and land) to identify its Clery Geography pursuant to the four-part definition contained in the citation section of this finding. The College must provide the Department with a map accurately reflecting its Clery-reportable geography, and use this updated map when conducting the audit of crime statistics required by Finding #9 of this PRR and calculating all future crime statistics for its ASRs and its reports to the Department. Furthermore, the College must provide the Department with a copy of the training that it provides to its safety officers regarding proper crime definition and classification. Finally, the College must advise how its data crime system allows for the inclusion of public property in its daily crime log and incident reports.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and stated that the College had taken definitive action to address the violations identified in the PRR. The response also indicated that GRC is committed to using maps to accurately identify its Clery Geography and to document the specific locations where incidents of crime are reported as occurring.

Final Determination:

Finding #8 cited GRC for its failure to properly compile and disclose accurate and complete crime statistics, by location, for the years of 2008, 2010, 2011, 2012, 2013, and 2014, as outlined in the Noncompliance section above. Specifically, the review team found that the College did not accurately identify incidents of crime that occurred on public property that is immediately adjacent to or accessible from its campus and further failed to compile and disclose corresponding crime statistics in its ASRs and in its data submissions to the CSSDACT. As a result of these violations, the College was required to review, revise, and implement a data crime system that allows for the inclusion of "public property" in its daily crime logs and incident reports. Furthermore, the College was required to review all relevant property to identify its Clery Geography and to develop detailed policies and deliver trainings to instruct relevant staff on how to properly compile, classify, and tabulate accurate and complete crimes statistics by location going forward. In its response, the College concurred with the finding, and advised that it had taken remedial actions have been taken to meet the Clery compliance regulations when reporting crimes by location.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's admissions, all of the violations identified in the initial finding are sustained. The Department's examination

also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's responsive documents, including its new and revised policies, procedures, and identification of its Clery Geography to produce complete and accurate crime statistics. On this basis, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The production and distribution of accurate and complete ASRs and AFSRs are fundamental to the law's campus safety goals. Any failure in this regard deprives students and employees of important campus safety, crime prevention, and fire safety information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #9: Failure to Maintain an Accurate and Complete Crime Log

Citation:

The Clery Act and the Department's regulations require that an institution that maintains a campus police or a campus security department must maintain a written, easily understood daily crime log that records any crime that occurs within its Clery Geography, as described in paragraph (ii) of the definition of Clery Geography in paragraph (a) of this section, and that is reported to the campus police or the campus security department. This log must include the nature, date, time, and general location of each crime and the disposition of the complaint, if known. The institution must make an entry or an addition to an entry to the log within two business days, as defined under paragraph (a) of this section, of the report of the information to the campus police or the campus security department, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim. The institution must make the crime log for the most recent 60-day period open to public inspection during normal business hours. The institution must make any portion of the log older than 60 days available within two business days of a request for public inspection. 34 C.F.R §668.46(f).

Noncompliance:

GRC failed to maintain an accurate and complete crime log throughout the review period. First, the College failed to incorporate all of the required elements into its crime log. More specifically, a review of its crime logs from 2008 through 2014 indicates that disposition information was never provided.

Secondly, the College failed to update its crime log within two business days. During the review team's interview with the GRC Director of Security, he admitted that adhering to this 2 day timeline was something that his Department needed to fix. It appears that the standard operating procedure of GRC's Safety Department was to update the crime log once per week, on Friday afternoons, as noted in five successive crime logs updates in 2014 (See Exhibit D). In fact, the GRC Safety Office called its crime log the "Weekly Crime Log," further evidencing this fact. This standard operating procedure remained in existence from 2008 until 2014.

Thirdly, the College failed to maintain a crime log for the required 60 day period. In December of 2014, the daily crime log did include the past 60 days of crime statistics as required by the regulations. In fact, the daily crime log included the entire calendar year. However, after the first daily crime log was printed in January 2015, the crime log was only maintained as far back as the beginning of January 1, 2015. Therefore, during January and February 2015, members of the public were unable to request 60 days' worth of crime log data, and the school remained noncompliant until March of 2015 when a minimum of 60-days' worth of crime data from any point in time became available.

And lastly, the College failed to enter crimes into its crime log for which it had issued Campus Advisories (i.e., timely warnings) to members of its campus community. Examples of these crimes are below:

Date	Crime	Police Report	Location
10/4/2010	Motor Vehicle Theft	10-11709	Campus Parking Lot
10/4/2010	Motor Vehicle Theft	10-11710	Campus Parking Lot
04/12/2010	Arson	No Report	Lindbloom Center
12/20/2012	Forcible Sexual Assault	No Report	On Campus
09/02/2013	Robbery	No Report	Bus stop on campus
09/25/2013	Robbery	13-11280	Bus stop on campus
12/31/2013	Robbery	13-15457	On campus near Parking lot 2
2013	Forcible Sexual Assault	No Report	On Campus as reported in the CSSDACT
08/29/2014	Burglary	No Report	On Campus 2 nd floor of the Tech Center
09/09/2014	Burglary	14-E00892	Facilities Operations Bldg.

By failing to enter the above-referenced offenses onto the daily crime log, the College failed to count all Clery crimes, and the College's security reports may have made the institution appear safer than it actually is.

The Clery Act seeks to ensure that campus community members and other stakeholders have timely access to accurate information about campus crime. The crime log provides up-to-date information that can help campus community members to make informed decisions about their own safety and the security of others. The crime log is to be an up-to-date information source that supplements the statistical disclosures in the ASR. Any failure to comply with this requirement deprives interested parties of vital information to which they are entitled.

Required Action:

As a result of these violations, GRC is required to review and revise its policies and procedures to ensure compliance with crime log requirements going forward. The revised policies and procedures must include the designation of a capable GRC official to ensure that all initial and updated crime log entries accurately reflect the facts surrounding all offenses, including the occurrence dates of the crimes, the geographic locations of the crimes, their dispositions (if known), and any other pertinent information, and ensure that these entries are made within the required time timeframe, as prescribed by the Clery Act. GRC must also ensure that, at any time, 60 days' worth of it's the daily crime log is readily accessible to the campus community and the general public for review upon request. A copy of the revised policies and procedures must be submitted with the College's response to this PRR.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and stated that on August 18, 2016, it initiated a new policy, SA-28, that is intended to provide for the maintenance of an accurate, complete, and accessible Daily Crime Log.

Final Determination:

Finding #9 cited GRC for its failure to maintain accurate and complete crime logs for calendar years of 2008, 2010, 2011, 2012, 2013, and 2014, as outlined in the Noncompliance section above. Specifically, the review team found that the College routinely failed to: 1) enter incidents of crime that occurred on its Clery Geography, or within its patrol zone, within two business days; 2) failed to update its crime log for the required 60-day period, including crimes for which it was required to issue timely warnings; and 3) failed to include all the required elements in its crime logs. As the result of these violations, the College was required to review and revise its policies and procedures to ensure compliance with respect to the crime log requirements going forward. In its response, the College concurred with the finding and stated that remedial actions had been taken to meet the Clery compliance regulations.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's admissions, all of the violations identified in the initial finding are sustained. The Department's examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's responsive documents, including its new and revised policies, procedures, and the identification of its Clery Geography to produce complete and accurate crime statistics. On this basis, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of GRC must take all other action that may be necessary to address the deficiencies identified by the Department as well as any additional deficiencies and weakness that were detected during the preparation of GRC's response, and /or as may be needed to otherwise ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The establishment and maintenance of an accurate, complete, and accessible daily crime log is an essential part of a compliant *Clery Act* compliance program and serves the transparency goals of the law. Any failure in this regard deprives students and employees of timely access to up-to-date campus safety information to which they are entitled. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA and the *Clery Act* as required by its PPA. Nevertheless, GRC is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #10: Failure to Maintain an Accurate and Complete Fire Log

Citation:

The HEA and the Department's regulations require that an institution that operates an on-campus student housing facilities must maintain a written, easily understood fire log that records, by the date on which a fire was reported, any fire that occurs in an on-campus student housing facility. This log must include the nature, date, time, and general location of each fire.

An institution must make an entry or an addition to an entry to the log within two business days, as defined under §668.46(a), of the receipt of the information. An institution must make the fire log for the most recent 60 day period open to public inspection during normal business hours. The institution must make any portion of the log older than 60 days available within two business days of a request for public inspection. An institution must make an annual report to the campus community on the fires recorded in the fire log. 34 C.F.R. §668.49(d).

Noncompliance:

GRC failed to maintain an accurate and complete fire log and failed to report a fire in the CSSDACT. Specifically, a kitchen fire occurred in the GRC student housing village, known as

Campus Corner Apartments (CCA), on Friday, December 19, 2014. The College logged this fire into its DCL in the following manner:

- Date/Time Occurred: 12/20/2014 16:40
- Date/Time Reported: 12/19/2014 17:10
- Description: Kitchen Fire
- Location: Student Housing
- Disposition: Closed/No Further Action

In doing so, the College committed the following violations:

- The fire was assigned Case Number 4371 and entered into the Daily Crime Log on Tuesday, December 30, 2014. This was 11 days after the event and not within the two business day requirement.
- Entry 4371 also lists the fire as having been reported 24 hours before the fire actually occurred (see the "date/time reported" above).
- The location provided is too vague as there are 12 residential buildings on campus, each with a letter designation. The above only lists the fire as having occurred at "student housing," without designating the specific building as required by 34 C.F.R. §668.49(b).
- The 2015 ASR/AFSR reports the occurrence of only one fire in 2014, on 8/8/14, inside residence hall CCA-M. There is no mention of the above-referenced fire that reportedly took place on 12/19/2014, recorded as incident number 4371.
- The 2015 and the 2016 CSSDACT for the College indicates that no fires took place in 2014.

Failure to establish and maintain an accurate and complete fire log deprives interested persons of important fire safety information to which they are entitled. Access to this information permits campus community members, especially those who live in campus housing, to make well-informed decisions about where to work and study and empowers them to play more active roles in their own safety and security.

Required Action:

As a result of these violations, GRC must develop and implement policies and procedures that will govern the preparation, publication, and distribution of both the fire log and the AFSR, and will otherwise ensure that all fire safety operations at GRC are carried out in accordance with the HEA going forward. The new procedures also must articulate how prospective students and employees will be notified of the AFSR's availability.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the institution accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and stated that the College has taken adequate remedial action and developed and implemented new policies and procedures, to govern the proper maintenance of accurate, complete, and accessible fire logs going forward.

Final Determination:

Finding #10 cited GRC for multiple violations of the HEA fire safety requirements and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to maintain an accurate and complete fire log in 2014. This violation, like the crime log finding, is based on a thorough review of documents collected during the review team's fieldwork, and is further supported by interviews with institutional officials. The team identified five specific instances in which GRC entered inaccurate or incomplete information, failed to update prior entries, or failed to enter any information at all about a campus fire. As noted, this condition also contributed to statistical discrepancies between the data included in the College's AFSRs and its reporting to the CSSDACT. This finding is closely associated with the crime log violations identified in Finding #9. These deficiencies and the discrepant information that resulted can only serve to confuse users of the various sources of crime and fire statistics data required by the *Clery Act* and the HEA. As a result of these violations, GRC was required to develop and implement new policies and procedures to ensure compliance with the fire log requirements to ensure that these violations do not recur. In its response, the College concurred with the finding and stated that remedial actions have been taken to meet the relevant HEA compliance regulations.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's admissions, all of the violations identified in the initial finding are sustained. The Department also determined that the College's remedial action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for purposes of this Program Review. Nevertheless, the officials and director of GRC are put on notice that they must take all necessary action to address the deficiencies identified by the Department as well as any other deficiencies and weakness that were detected during the preparation of the institution's response, and/or as may otherwise be needed to ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the HEA fire safety requirements that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. All institutions that maintain on-campus student housing are required to develop and implement a fire safety program and be transparent about its policies and procedures. This information must be part of an accurate and complete AFSR. Such institutions must also maintain a fire log that is freely accessible to the campus community and the general public. These requirements are fundamental to the law's fire safety goals, especially for those living in campus housing. GRC has asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the HEA's fire safety provisions, as required by its PPA. Nevertheless, GRC is advised that its remedial actions,

whether already completed or planned for the future, cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and /or require additional corrective actions as a result.

Finding #11: Omissions/Inadequacy of Required Security Policy Statements

Citation:

The Clery Act and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees, a comprehensive ASR that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. §668.46(b).

The ASR must be prepared and actively distributed as a single document. Acceptable means of delivery include regular U.S. Mail, hand delivery, campus mail distribution to the individual, or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. §668.41(e)(1). The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the ASR's availability, its contents, and its exact electronic address if posted to a website. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. 34 C.F.R. §668.41(e)(4).

The ASR must include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide, certain sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistics for certain hates crimes, as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs, illegal usage of controlled substances, liquor, and weapons, also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. 34 C.F.R. §668.46(c)(1).

Additionally, the ASR must include several policy statements. These disclosures are intended to inform the campus community about the institution's security policies, procedures, and the availability of programs and resources, as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions also must provide detailed policies of the issuance of timely warnings, emergency notifications, and evacuation procedures. All required statistics and policies must be included in a single comprehensive document, known as an ASR. With the exception of certain drug and alcohol

program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements of the Act. §485(f) of the HEA; 34 C.F.R. §668.46(b).

Finally, each institution must submit its crime statistics to the Department for inclusion in the Office of Postsecondary Education's CSSDACT 34 C.F.R. §668.4(e)(5).

Noncompliance:

GRC failed to develop numerous required statements of policy, procedure, practice, and programs, and/or otherwise failed to include such statements in its ASRs produced during the review period. Although the violation specifically covers the ASRs produced in 2014 and 2015, the Department's investigation indicates that these violations have likely persisted since the inception of the Clery Act. The scope of this violation represents a general failure to comply with the Clery Act and likely indicates a systemic lack of administrative capability.

The nature and extent of these deficiencies supports the Department's reference to serious administrative impairment and suggests a host of failures related to insufficient policy development and implementation, as well as inadequate communication and organizational coordination efforts regarding the limited, but discernible, policies, procedures, and programs that the College had in place during the review period. All of these conditions are of great concern to the Department. Specifically, the following deficiencies were noted:

The 2014 ASR:

- *Failed to provide a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses;*
- *Failed to provide a description of the educational programs to promote the awareness of dating violence, domestic violence, sexual assault, and stalking;*
- *Failed to provide a statement that the College will provide a notification to students that the institution will change a victim's academic and living situations after an alleged sex offense, and of the options for those changes, if those changes are requested by the victim and are reasonably available;*
- *Failed to provide the procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that:*
 - *The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and*
 - *Both the accuser and accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense.*

- *Failed to provide the sanctions that the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other sex offenses;*
- *Failed to provide a statement of policy regarding missing student notification procedures that contain an option for each student to identify a contact person(s) whom the institution shall notify within 24 hours of the determination that the student is missing, if the student has been determined missing by the institutional police or campus security department, or the local law enforcement agency:*
 - *A statement advising students that their contact information will be registered confidentially, that this information will be accessible only to authorized campus official, and that it may not be disclosed, except to law enforcement personnel in furtherance of a missing person investigation; and,*
 - *A statement of policy advising students that, if they are under 18 years of age and not emancipated, the institution must notify a custodial parent or guardian within 24 hours of the determination that the student is missing, in addition to notifying any additional contact person designated by the student.*

The 2015 ASR:

- *Failed to provide a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses;*
- *Failed to define "consent" in reference to sexual activity;*
- *Failed to describe safe and positive options for bystander intervention;*
- *Failed to provide a description of institution's ongoing prevention and awareness campaigns for student and employees;*
- *Failed to identify procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking. The College must describe each type of disciplinary proceeding used by the institution, as well as steps, anticipated timelines, and decision-making processes for each type of disciplinary proceeding. The College must also provide information as to how one may file a disciplinary complaint and how the institution determines which type of proceeding to use based on the circumstances of the allegation;*
- *Failed to describe the standard of evidence that will be used during any institutional disciplinary proceeding which arises from an allegation of dating violence, domestic violence, sexual assault, or stalking;*

- *Failed to provide assurance that the proceedings will:*
 - *include a prompt, fair, and impartial process from the initial investigation to the final result, and,*
 - *be conducted by an official who receives training on issues related to dating violence, domestic violence, sexual assault, and stalking on at least an annual basis and who is trained on how to conduct an investigation and hearing process to ensure the protection of the safety of victims while promoting accountability;*
- *Failed to provide a statement that the College will simultaneously provide a notification, in writing, to both the accuser and the accused of the result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking;*
- *Failed to provide copies of its procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding, as well as any information regarding changes to the outcome of the proceeding and information regarding when the results are final;*
- *Failed to provide a description of educational programs to promote the awareness of rape, acquaintance rape, and other serious sex offenses;*
- *Failed to provide a statement that the College will provide a notification to students that the institution will change a victim's academic and living situations after an alleged sex offense, and of the options for those changes, if those changes are requested by the victim and are reasonably available;*
- *Failed to provide procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that:*
 - *The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and,*
 - *Both the accuser and accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense.*
- *Failed to provide the sanctions that the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other serious sex offenses;*
- *Failed to provide a statement of policy, where applicable, of the rights of victims, and the institution's responsibilities for orders of protection, "no contact" orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court or by the institution;*

- *Failed to provide information about how the institution will protect the confidentiality of victims and other necessary parties;*
- *A statement of policy regarding missing student notification procedures that contain an option for each student to identify a contact person or persons whom the institution shall notify within 24 hours of the determination that the student is missing, if the student has been determined missing by the institutional police or campus security department, or the local law enforcement agency. Additionally:*
 - *A statement advising students that their contact information will be registered confidentially, that this information will be accessible only to authorized campus official, and that it may not be disclosed, except to law enforcement personnel in furtherance of a missing person investigation; and,*
 - *A statement of policy advising students that, if they are under 18 years of age and not emancipated, the institution must notify a custodial parent or guardian within 24 hours of the determination that the student is missing, in addition to notifying any additional contact person designated by the student.*

The failure to produce accurate and complete ASRs in accordance with Federal regulations to the extent documented above is indicative of a severe administrative impairment and also deprives campus community members and other stakeholders of access to important security information to which they are entitled.

Required Action:

As a result of these violations, GRC must develop and implement substantive policies and procedures to ensure that its ASRs are prepared, published, and distributed in accordance with the Clery Act and the Department's regulations. Using its new policies as a guide, the College must submit a copy of its 2017 ASR with its response to this program review in order to allow the Department to determine whether it is accurate and materially-complete, meaning that the report was revised and contains all of the statistical, policy, procedure, and programmatic disclosures required by 34 C.F.R. §668.46(b).

Once the report is distributed, GRC must submit a copy of that report along with evidence that clearly shows that the active distribution and active notification requirements were met. This certification must also affirm that GRC understands its Clery Act obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

Based on an evaluation of all available information, including GRC's response, the Department will determine appropriate additional actions and advise the College accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding, stating that it has taken adequate corrective actions and has developed and implemented new policies and procedures that will be included in each ASR and AFSR going forward.

Final Determination:

Finding #11 cited GRC for multiple violations of the *Clery Act* and the Department's regulations. Specifically, the review team found that the institution's ASRs for calendar years 2014 and 2015 did not include complete policy statements in numerous areas, as detailed in the Noncompliance section above. The extent and persistence of these violations indicated a general failure on the part of GRC to comply with the most basic terms and conditions of its PPA and, in so doing, has called its own ability and/or willingness to properly administer the Title IV, FSA programs into serious question.

As a result of these violations, GRC was directed to take intentional and comprehensive remedial action to address these deficiencies and the conditions that led to them. As part of this process, the College was required to review and revise the policies and procedures that governed the production and distribution of the ASR and to then develop and implement additional internal guidance as needed to provide reasonable assurance that all campus safety operations will be carried out in accordance with the law going forward. GRC was then required to produce a 2017 ASR and AFSR and distribute these documents to required recipients, which it did on September 29, 2017, later providing a revised 2017 ASR on October 13, 2017. In its response, GRC concurred with the finding, described the remedial actions that it had taken, and submitted documents in support of its claims.

The Department carefully reviewed all available information, including GRC's response and supporting documentation. Based on that review, and the College's admissions, all of the violations identified in the initial finding are sustained. The Department also determined that the College's remedial action plan meets minimum requirements and, for these reasons, has accepted the response and considers this finding to be closed for purposes of this Program Review. Nevertheless, the officials and directors of GRC are put on notice that they must take all necessary action to address the deficiencies identified by the Department as well as any other deficiencies and weakness that were detected during the preparation of the institution's response, and/or as may otherwise be needed to ensure that these violations do not recur.

GRC is, once again, reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. All institutions that maintain on-campus student housing are required to develop and implement a comprehensive fire safety program and to be transparent about its policies and procedures. This information must be part of an accurate and complete AFSR and fire log. These requirements are fundamental to the law's campus safety goals, especially for those living in campus housing. GRC has asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the *Clery Act's* fire safety provisions as required by its PPA. Nevertheless, GRC is advised that its remedial actions,

whether already completed or planned for the future, cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #12: Discrepancies between Crimes Statistics included in the ASR and Crime Data reported to the CSSDACT

Citation:

The Clery Act and the Department's regulations require institutions to compile and disclose accurate and complete statistics concerning the on-campus occurrence of the following incidents: criminal homicide, certain sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Statistical disclosure of arrests and disciplinary actions related to the violation of Federal or state drug, liquor, and weapons laws are also required. To comply with these requirements, institutions must develop a system that allows for the collection of incidents of crime reported to any campus security authority as set forth by 34 C.F.R. §668.46(c)(1)(B).

Noncompliance:

GRC failed to report accurate crime statistics in its 2015 ASR, which was presented and labeled as the College's "2014 ASR." More specifically, this "2014 ASR" contained crime statistics for 2011, 2012, 2013, and 2014, making the report, in actuality, the 2015 ASR. In addition to that error, this ASR contained several statistics that did not match those reported by GRC to the Department's CSSDACT. Table 1 below provides a list of the discrepancies within the data reported for 2012, 2013 and 2014.

Table: 2012 - 2014 Crime Statistic Discrepancies Reported to the Department's CSSDACT vs. the Crime Statistics Reported in the College's ASR

<i>Crimes/Referrals</i>	<i>GRC's ASR Statistics</i>	<i>CSSDACT Statistics</i>	<i>Clery Geography</i>	<i>Year</i>
<i>Robbery</i>	<i>7</i>	<i>0</i>	<i>On Campus</i>	<i>2012</i>
<i>Drug Referral</i>	<i>27</i>	<i>13</i>	<i>Student Housing</i>	<i>2012</i>
<i>Liquor Referral</i>	<i>69</i>	<i>17</i>	<i>Student Housing</i>	<i>2012</i>
<i>Sex Offense-Force</i>	<i>0</i>	<i>1</i>	<i>On Campus</i>	<i>2013</i>
<i>Robbery</i>	<i>3</i>	<i>6</i>	<i>Public Property</i>	<i>2013</i>
<i>Drug Referral</i>	<i>3</i>	<i>21</i>	<i>Student Housing</i>	<i>2013</i>
<i>Weapons Referral</i>	<i>0</i>	<i>1</i>	<i>Public Property</i>	<i>2013</i>
<i>Burglary</i>	<i>0</i>	<i>2</i>	<i>Student Housing</i>	<i>2014</i>
<i>Drug Referral</i>	<i>56</i>	<i>28</i>	<i>On Campus</i>	<i>2014</i>
<i>Liquor Referral</i>	<i>24</i>	<i>12</i>	<i>On Campus</i>	<i>2014</i>
<i>Weapons Referral</i>	<i>0</i>	<i>6</i>	<i>Student Housing</i>	<i>2014</i>
<i>Drug Referral</i>	<i>0</i>	<i>28</i>	<i>Student Housing</i>	<i>2014</i>
<i>Liquor Referral</i>	<i>0</i>	<i>12</i>	<i>Student Housing</i>	<i>2014</i>

Additionally, GRC failed to include the category of "Arson" in the above-referenced ASR, and failed to include arson crimes in the required three years of crime statistics. This failure affected

the accurate collection of data reported in the College's ASR and can have a major impact on how GRC processes crimes required by Federal law.

Failure to report accurate crime statistics in accordance with Federal guidelines deprives the campus community of important security information that can empower its members to be informed and play active roles in their own safety and security.

Required Action:

As a result of these violations, GRC must develop and implement policies and procedures to ensure that its crime statistics are prepared, published, and distributed in accordance with the Clery Act. Using its new policies as a guide, the institution must revise its 2014 ASR and CSSDACT-reported crime statistics to ensure that they are accurate and materially complete in accordance with 34 C.F.R. §668.46(b). If, during the course of its review of the 2014 crime statistics, the College identifies any additional deficiencies, it must advise the Department of these deficiencies in its response to this PRR. Furthermore, GRC must submit a copy of its 2017 ASR with the category of "Arson" included in its crime statistics.

GRC will be required to actively distribute the 2017 ASR to all enrolled students and current employees in accordance with 34 C.F.R. §668.41(e). Once the new ASR is distributed, the College will also be required to provide documentation to the Department, no later than October 31, 2017, evidencing that this distribution took place on or before October 1, 2017, along with a certification statement attesting to the fact that the materials were distributed in accordance with the Clery Act. This certification must also affirm that GRC understands its Clery Act obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur. Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the institution accordingly in its FPRD.

Institutional Response:

In its official response, GRC management concurred with the finding and stated that the College has taken corrective actions and developed new policies and procedures that will result in the compilation and disclosure of accurate and complete crime and fire statistics in its ASRs, AFSRs, and the CCSSDACT.

Final Determination:

Finding #12 cited GRC for multiple violations of the *Clery Act* and the Department's regulations. Specifically, the review team found that the College failed to submit accurate and complete crime statistics to the CSSDACT that had been fully reconciled with the statistical disclosures included in its ASRs for 2012 through 2015. The specific discrepancies are listed in the chart in the Noncompliance section above. As a result of these violations, GRC was required to respond to each identified exception and take all necessary corrective actions to address the deficiencies and the organizational/process weaknesses that contributed to them. GRC was also required to develop a comprehensive system of policy, procedure, and systems improvements to ensure that

that the College's crime statistics are compiled and disclosed in an accurate, complete, and fully-reconciled manner going forward. In its response, GRC concurred with the finding, described its remedial actions, and submitted documentation in support of its claims.

The Department carefully examined all available information, including GRC's narrative response and supporting documentation. Based on that review, and the College's admissions, all of the violations identified in the initial finding are sustained. This examination also indicated that the identified violations were, for the most part, satisfactorily addressed by GRC's updated policies and procedures. As such, the Department has determined that the College's corrective action plan meets minimum requirements and, for these reasons, has accepted GRC's response and considers this finding to be closed for the purposes of this Program Review.

Notwithstanding this action, the Directors and officials of GRC are advised that they must take any other action that may be needed to address the deficiencies identified by the Department as well as any additional deficiencies and weaknesses that were detected during the preparation of GRC's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Once again, GRC is reminded that the exceptions identified above constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct violations of this type once they occur. The compilation and dissemination of accurate, complete, and fully-reconciled crime statistics are among the most basic requirements of the *Clery Act* and are fundamental to its campus safety goals. The College asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the *Clery Act's* provisions as required by its PPA. Nevertheless, GRC is advised that its remedial actions, whether already completed or planned for the future, cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

Finding #13: Failure to Comply with Drug and Alcohol Abuse Prevention Program Requirements

Citation:

The DFSCA and the Department's Part 86 regulations require each Institution of Higher Education (IHE) to certify that it has developed and implemented a drug and alcohol abuse prevention program (DAAPP). The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

The DAAPP disclosure must include all of the following elements:

- *A statement about an institution's standards of conduct that prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees;*
- *A description of legal sanctions imposed under Federal, state, local laws, and ordinances for unlawful possession or distribution of illicit drugs and alcohol;*
- *A description of the health risks associated with the use of illicit drugs and alcohol abuse;*

- A description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees; and,
- A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.

The DAAPP disclosure must be actively distributed to all employees and students enrolled for academic credit (except for continuing education credits) on an annual basis. The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll at a date after the initial distribution and for employees who are hired at different points throughout the year.

In addition, each IHE must conduct a biennial review to determine the effectiveness of its DAAPP and to ensure consistent enforcement of applicable drug and alcohol-related statutes, ordinances, and institutional policies against students and employees found to be in violation. The IHE must also produce a report of findings, maintain its supporting materials, and provide them to the Department upon request. 34 C.F.R. §§86.3 and 86.100.

Noncompliance:

GRC violated multiple requirements of the DFSCA during the review period. Specifically, the review team found that GRC's DAAPP disclosure did not include an adequate description of the institution's disciplinary sanctions for students. In fact, the entire section regarding disciplinary sanctions as included in the College's DAAPP was as follows:

"Official college action will be taken when violation of state law or college policy regarding alcohol and other illicit drugs occurs."

The above statement does not address what the potential sanctions are or which sanctions will be used by the College.

Furthermore, the Department requested copies of the DAAPPs for the 2010-2015 calendar years. Instead, the College submitted a copy of its 2005 DAAPP to the Department for its review. Additionally, when requested, the College was unable to provide copies of its DAAPPs used for employees during the same 2010-2015 timeframe.

GRC also failed to actively distribute its DAAPP materials to students and employees on an initial and annual basis. Simple inclusion of drug and alcohol information in the institution's publications does not qualify as an acceptable means of active distribution to students and employees. In speaking to the review team, GRC's Human Resource Director indicated that, as of the date of the review team's on-site visit, the College had no DAAPP and no information on Part 86 for its employees. He further acknowledged that a complete and comprehensive DAAPP was something that the school needed to construct in order to be in compliance. Moreover, during the on-site review, GRC's Health Education Coordinator, responsible for the distribution of the DAAPP, advised that: 1) the only means of distributing the DAAPP was by printing it in the student handbook; and 2) the College had no mechanism for distributing the DAAPP to its international students.

Finally, GRC persistently failed to assess the effectiveness of its DAAPP and to evaluate the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct related to drugs and alcohol in its 2012, 2014, and 2016 Biennial Reviews.

Based on all of the foregoing, the Department's review indicates that GRC has never fully complied with the DFSCA during its participation in the Title IV, FSA programs.

Failure to comply with the DFSCA's DAAPP requirements deprives students and employees of important information regarding the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse. Failure to comply with the biennial review requirements also deprives the institution of important information about the effectiveness of its own drug and alcohol programs. Such failures may contribute to increased drug and alcohol abuse, as well as to an increase in drug and alcohol-related violent crime at an institution.

Required Action:

As a result of these violations, GRC is required to take all necessary corrective action to resolve these violations. At a minimum, GRC must do the following:

- Develop, update, and publish a single, materially-complete document, detailing the drug and alcohol prevention program(s) containing all the elements required in a fully comprehensive DAAPP. 34 C.F.R. §86.100 (a).
- Develop and implement procedures for ensuring that the required DFSCA materials are distributed to every current student who is enrolled for academic credit, as well as to every current employee of GRC. The institution must also make provisions for providing copies of the DAAPP to students who enroll after the initial distribution, and to employees who are hired at different times throughout the year. 34 C.F.R. §86.100 (a).
- Provide documentation evidencing the distribution, as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the DFSCA. The documentation should contain proof that the materials were distributed; along with a narrative as to how the College believes it has met the applicable statutory and regulatory requirements. 34 C.F.R. §§86.3 and 86.4.
- Conduct a biennial review to measure the effectiveness of its DAAPP. GRC must describe the research methods and data analysis tools used to determine program effectiveness, and identify the officials and offices responsible for assessing data collected for evaluation. Moreover, the biennial review report must be approved by GRC's President and/or its Board.
- Submit a statement certifying that the institution understands its DFSCA obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

A copy of the revised policies and procedures must be submitted with the College's response to this PRR. The College must also provide a response addressing the issues in this finding and those issues associated with the identified incidents, and include it in its response.

Based on an evaluation of all available information, including GRC's response, the Department will determine if additional actions will be required and will advise the institution accordingly in its FPRD.

Institutional Response:

In its official response, GRC management acknowledged that the College had never established and implemented comprehensive DAAPP. GRC went on to claim that some intervention strategies were employed and that some resources for employees and students were in place, but conceded that these efforts were never integrated into a complete program. As such, College officials asserted that remedial action had been taken and that a compliant DAAPP is now in operation.

Final Determination:

Finding #13 cited GRC for multiple violations of the *DFSCA* and Part 86 regulations, as outlined in the Noncompliance section above. Specifically, the review team found that GRC failed to develop and implement a comprehensive DAAPP that addressed all required subjects from calendar years 2010 through 2015. During this time, the College also failed to distribute program materials to enrolled students and current employees, as required. Moreover, the College failed to conduct biennial reviews to assess the effectiveness of its DAAPP and the consistency of sanctions imposed for violations of its codes of conduct throughout the review period. The Department's examination further found that GRC had never fully complied with *DFSCA* during its participation in the Title IV, FSA programs, and that this persistent failure was attributable to a general failure to assign qualified staff to this function, and to develop and implement internal policies and procedures to guide the program.

These separate and distinct violations necessarily follow from one another because the biennial review is primarily a study of the DAAPP's effectiveness. Therefore, an institution cannot conduct a substantive biennial review until it has a fully-functional DAAPP in place and program requirements and standards of conduct are communicated clearly to all members of the campus community. As a result of these violations, GRC was required to ensure that an adequate DAAPP was in place, produce and distribute an annual DAAPP disclosure, conduct a substantive biennial review, and produce an initial report. In its response, College officials concurred with the finding, described their remedial actions, and submitted documents in support of their claims.

The Department carefully reviewed all available information, including GRC's narrative response and supporting documentation. Based on this review, and the College's admissions, each of the violations noted in the initial finding are hereby sustained. The review team's examination also showed that the identified violations were, for the most part, addressed by GRC's new Part 86 program materials, new annual disclosure, proposed biennial review report, and its new and revised policies and procedures. As such, the Department also determined that

the College's remedial action plan meets minimum requirements, and, for these reasons, has accepted the response and considers this finding to be closed for purposes of this Program Review. Nevertheless, the officials and Directors of GRC are put on notice that the College must take all necessary action to address the deficiencies and weaknesses identified by the Department as well as those that were detected during the preparation of the response to the Department's report and as may otherwise be needed to ensure that these violations do not recur.

In this regard, GRC is advised that it must continue to develop its DAAPP. The College must also ensure that it distributes accurate and complete DAAPP materials to all students and employees on an annual basis, in accordance with the Department's regulations and the College's procedures. Moreover, going forward, GRC must conduct substantive biennial reviews and do so on the required schedule. GRC officials must also take care to ensure that each review is, in fact, a probative inquiry into the program's effectiveness; the review process must not merely become a conclusory ratification of existing policy. Finally, the College must produce detailed reports that clearly state the methods used and outcomes reached during each review. Each report must also be approved by GRC's President and/or its Board.

GRC is reminded that the exceptions identified above constitute serious and persistent violations of the *DFSCA* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. The College asserted that it has taken adequate remedial actions and is now in compliance with the *DFSCA* as required by its PPA. Nevertheless, GRC officials must understand that the Department deems compliance with the *DFSCA* to be essential to maintaining a safe and healthy learning environment. This is true for all institutions, regardless of their size, location, mission, orientation, or organizational structure. Data compiled by the Department show that the use of illicit drugs and alcohol abuse is highly correlated to increased incidents of violent crime on campus, increased absenteeism, and a failure to successfully complete a program of study. The compliance failures identified above deprived the College and its officials of important information about the effectiveness of any drug and alcohol programs that were in place during the Department's review period. Such failures may contribute to increased drug and alcohol abuse on-campus as well as to an increase in drug and alcohol-related violent crime and constitute a violation of Federal law. For these reasons, GRC is reminded that corrective measures cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective measures as a result.

Finally, the Department strongly recommends that GRC re-examine its drug and alcohol abuse prevention policies, procedures, and programs on at least an annual basis and revise them as needed to ensure that they continue to reflect current College policies and are in full compliance with the *DFSCA*. Please be advised that the Department may request information on a periodic basis to test the effectiveness of the College's new policies and procedures.

Summation:

In its official response and supplemental production, GRC has asserted that its remedial action plan, inclusive of its new and revised internal policies and procedures, will facilitate the institution's efforts to get into full compliance with the *Clery Act*, the HEA fire safety requirements, and the *DFSCA* for the first time.

The violations identified throughout the review process triggered a special concern for the Department. Compliance with the *Clery Act*, the HEA fire safety requirements, and the *DFSCA* are an essential part of effective campus safety, crime prevention, and substance abuse prevention programs. Access to accurate, complete, and transparent disclosures of safety information helps students, employees, and other stakeholders to make well-informed decisions about where to study, work, and live. The transparency created by these disclosures also empowers campus community members to play more active roles in their own safety and security. GRC asserted that it has taken adequate remedial actions and that, by doing so, it is now in compliance with the *Clery Act*, the HEA fire safety requirements, and the *DFSCA*, as required by its PPA. Nevertheless, GRC officials must understand that the violations documented here deprived students, employees, parents, the media, and other interested parties of access to important campus safety, crime prevention, fire safety, and substance abuse prevention information to which they are entitled. For these reasons, the College is, once again, advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department may require additional corrective actions as a result.

The Department's objective in conducting this, and all Campus Crime Program Reviews, is to improve the safety of America's college campuses. The development and implementation of a substantive corrective action plan is an essential first step in moving GRC toward full compliance with the *Clery Act* as soon as possible.

The Department strongly recommends that GRC re-examine its campus safety and general Title IV policies and procedures on an annual basis to ensure that they continue to reflect current institutional practices and are compliant with Federal regulations. As part of these periodic reviews, GRC officials may wish to review the Department's "Handbook for Campus Safety and Security Reporting" (2016) for guidance on complying with the *Clery Act*. The Handbook is available online at: www2.ed.gov/admins/lead/safety/handbook.pdf. The Department also provides a number of other *Clery Act* training resources. GRC officials can access these materials at: www2.ed.gov/admins/lead/safety/campus.html. The regulations governing the *Clery Act* can be found at 34 C.F.R. §§668.14, 668.41, and 668.46.

Finally, GRC management is also advised to take immediate action to ensure that the College is in compliance with Section 304 of the Violence Against Women Reauthorization Act of 2013 (VAWA). VAWA amended the *Clery Act* to require institutions to compile and disclose statistics for incidents of sexual assault, dating violence, domestic violence, and stalking. VAWA also requires institutions to include new policy, procedural, and programmatic disclosures regarding sexual assault prevention and response in its ASRs. All institutions were already obligated to comply with the statutory requirements of VAWA and must include the new required amendments in the 2014 ASR. Because the Department issued Final Rules on the VAWA amendments on October 20, 2014, the new regulations went into effect on July 1, 2015, per the Department's Master Calendar. GRC officials may access the text of the Final Rule at: <http://ifap.ed.gov/fregisters/attachments/FR102014FinalRuleViolenceAgainstWomenAct.pdf>.

Recommendation from the Program Review Report:

It is recommended that the College review its email distribution methods used to send out timely warnings and emergency notifications, which, at GRC, are known as Campus Alerts. During the on-site review process, GRC's IT Director advised the review team that in order to send out an "all campus alert," the IT staff is required to merge the email addresses contained within a "restricted email accounts" list serve with the email addresses contained within the "currently enrolled students" list serve - a process that was said to take approximately 30 minutes to complete. This extra time can have serious safety implications when emergency warnings need to be immediately sent out to the campus community. Additionally, one or more email distribution lists may accidentally be left off when sending out an emergency notification to the entire campus.

Currently, the College uses the following three general email accounts to send out its campus alerts as explained by the Director of Marketing and Communications:

- | | |
|------------------------------------|--|
| All Campus: | This list is for only faculty and staff on the main campus. |
| Restricted All Campus Mail: | This list is for all faculty and staff on all of the Colleges campuses. |
| All Current Students: | Currently registered students at the College and those students who enrolled in the last year. |

For timeliness and accuracy, the Department recommends that the College consider creating one, dedicated "all-inclusive campus" email list serve to ensure that, when necessary, all members of the campus community can be alerted as expeditiously as possible.

In addition, the College may wish to review the information that it provides to its community via timely warnings and emergency notifications. For example, the following situation below unfolded on March 18, 2014:

A fight took place at the construction site for the Trades Center Building on campus. Gunshots were heard at 7:15 PM by campus security officers. The timeline was established by a 911 call. The perpetrators ran onto the main campus.

Campus Advisory – Emergency situation on main campus

March 18, 2014

Details: The main campus is experiencing an emergency event. Police are on scene. If you are on campus, follow lockdown procedures and stay inside. We are assessing the situation and will provide updates as we receive more information.

The review team's assessment uncovered the following responses to the above-referenced situation:

- The first critical email was not sent to the Restricted All College Mail address list serve until 8:19 PM.
- A second Campus Advisory, entitled, “Campus Advisory – Update: Emergency Situation on the Main Campus,” was sent at 8:52PM. No recipient addresses were included on this Campus Advisory, so it is unknown to whom the email was sent.⁸ The Advisory read as follows:

Details: Update – There was an incident on the Trades construction site involving a group of individuals who were fighting. Campus Safety observed the incident and witnessed shots fired in the vicinity. The individuals in the fight dispersed onto the main campus.

- A third email was sent out, seven minutes after the above-referenced Campus Advisory, to the Restricted – All College Mail list serve :

Details: UPDATE - Campus operations on main campus are NORMAL. There was an incident on the Trades construction site (across 320th St.) involving a group of individuals who were fighting. Campus Safety observed the incident and witnessed shots fired in the vicinity. Police responded immediately. The individuals involved in the fight dispersed onto the main campus and attempted to elude police by hiding in the woods. When this occurred, Campus Safety initiated lockdown procedures.

Police conducted a search of the area and concluded their investigation on campus. The lockdown has ended and operations are returning to normal.

Issues identified:

- The first email warning was too vague as it only stated that the College was experiencing “an emergency event.” No mention of the gun shots fired in this first warning. Thus, the campus community was not able to appropriately weigh the danger presented by this situation, and, as a result, may not have taken adequate precautions.
- Unless the three above-referenced Campus Advisories were also sent to the All Current Student list serve, the staff and faculty were the only people to be warned about this incident via this method.
- The initial Campus Advisory was sent approximately 64 minutes after gunshots were first heard.
- This incident was entered into the Daily Crime Log as “Uncategorized,” and not as an Aggravated Assault.

⁸ However, as this second Advisory followed the first, noted above, the review team concluded that it was sent out to the same Restricted All College Mail list serve.

The *Clery Act* requires institutions to alert their campus communities to certain crimes in a manner that is timely and will aid in the prevention of similar crimes. The intent of a warning regarding criminal incidents is to enable people to protect themselves. This means that a warning should be issued as soon as pertinent information becomes available. This is critical; even if one does not have all the facts surrounding a criminal incident that represents a serious and continuing threat to your students and employees, one must issue a warning. The warning should also contain specific information about the type of the criminal incident at issue. For example, in this case, the fact that gun shots had been fired would have been important to include in the Campus Advisory as such detail allows members of the campus community to better evaluate how to react and how best to ensure their own safety.

Exhibit A

The following attachments contain the 2014 and 2015 requests to and responses from Green River as to the crime statistics that it requested from the Auburn Police Department.

Exhibit A1: This is GRC's 2014 request for crime statistics. The response received is highlighted in yellow below. The timeframe of the crimes requested is also highlighted in yellow.

From: Ronald Riley
To: Joe Ryan
Subject: RE: Crime Stats (Clery)
Date: Friday, September 25, 2015 7:45:46 AM

Perfect Joe, thank you!

Ron

From: Joe Ryan [mailto:jryan@auburnwa.gov]
Sent: Thursday, September 24, 2015 3:11 PM
To: Ronald Riley
Subject: RE: Crime Stats (Clery)

You bet. This is what it looks like using just the reporting district for the college. To be honest I was surprised at some of the numbers. We always have a hard time though because we know some of the issues elsewhere on Lea Hill are related to the college but we don't always know whether a student was involved.

We can pull in other reporting districts if you would like?

	10/1/2013 to 9/23/2015
Homicide	0
Murder	0
Sex Offenses	0
Robbery	6
Aggravated Assault	0
Commercial Burglary	1
Residential Burglary	13
Weapons Offense	1
Drug Offense	2
Liquor Offense	0

From: Ronald Riley [mailto:riley@greenriver.edu]
Sent: Thursday, September 24, 2015 1:03 PM
To: Joe Ryan
Subject: RE: Crime Stats (Clery)

Hi Joe,

The time frame is October 1, 2013 to now. With that I can amend the report from last year to include cases handled after the mandatory reporting time for the rest of the year to keep the stats correct. Please feel free to include all cases no matter how they came to be reported and I will pull the information I need. Thank you for your help.

Exhibit A2: On the following pages, you will find GRC's request to the Auburn Police Department for 2015 crime statistics. The information provided by the police department is on page 43 of this PRR and is highlighted in yellow. The clarifying instruction provided to the police department (to include only numbers of each crime category) is provided by Chris Turner of the campus security office, and can be found on page 45 of this PRR, highlighted in yellow.



April 6, 2016

Danielle Daskam, City Clerk/Records Specialist
 Auburn Police Department
 25 West Main Street
 Auburn, WA 98031

Campus Safety Office
 Extension 3350
 12401 SE 320th St.
 Auburn, WA 98092-3622
 (253) 833-9111 Auburn
 (206) 464-6133 Eastside
 (253) 924-0180 Tacoma
 Fax: (253) 268-3458

RE: Request for Crime Data

Dear Danielle Daskam:

According to the federal Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act, post-secondary schools are required to disclose statistics for certain crimes that occurred on campus and on public property within and immediately adjacent to school-owned or school-controlled buildings and property. We are required to disclose statistics that are reported to our department as well as to local and state law enforcement agencies. I am requesting the 2015 crime statistics for the following offenses:

Specific Crime Information Needed	
Aggravated Assault	Arson
Burglary	Dating Violence
Domestic Violence	Drug Law Violations
Fondling	Hate Crime
Incest	Intimidation
Liquor Law Violations	Manslaughter by Negligence
Motor Vehicle Theft	Murder and Non-Negligent Manslaughter
Rape	Robbery
Sexual Assault with an Object	Sex Offenses - Forcible
Sex Offenses - Non-Forcible	Simple Assault
Stalking	Statutory Rape
Weapon Law Violations	

Please specify if any of the above were categorized as Hate Crimes, and include the specific bias for classifying the incident as a hate crime.

I need to have the above crime data for the following non-campus locations which were contracted for use by Green River on the following dates and times during the calendar year 2015:

Location	Address	Start time	End time	Date(s) (end day of week in parentheses)
Auburn Library	1102 Auburn Ways, Auburn, WA 98002	6:00 PM	8:30 PM	1/5/2015-3/20/2015 (MW)
		6:00 PM	8:30 PM	3/30/2015-6/12/2015 (MW)

		5:35 PM	9:00 PM	6/22/2015-12/11/2015 (MW)
		6:00 PM	8:30 PM	9/21/2015-12/11/2015 (MW)
Auburn Memorial Stadium	Auburn High School, 711E Main Street Auburn, WA	4:00 PM	5:30 PM	2/1/2015-5/31/2015 (daily)
Mount Baker Middle School	620 3th Street SE, Auburn, WA	6:00 PM	8:30 PM	1/5/2015-3/20/2015 (Tih)
		6:00 PM	8:30 PM	3/30/2015-6/12/2015 (Tih)
Olympic Middle School	1225 K St SE Auburn, WA	6:00 PM	8:30 PM	9/21/2015-12/11/2015 (Tih)

(Note: MW denotes Mondays and Wednesdays; Tin denotes Tuesdays and Thursdays. We need crime data that happened only on those days within the dates and times listed.)

In addition, I'm requesting the required crimes statistics for the following areas which are considered "on campus" or "campus-controlled" or which are at public access points to Green River College Downtown Auburn Campus.

Place	Address	Start Time	End Time	Date(s) (and days of week of use are in parenthesis)
Green River College Downtown Auburn Campus (Clery on-campus)	GRC Downtown Auburn Campus 110 2 nd St. SW, Suite 135 Auburn, WA 98001	12:01 AM	11:59 PM	11/2015-12/31/2015 (SMTWThFSa)
Green River College Clery Public Property for Downtown Campus	Public streets and all sidewalk areas bordering, surrounding or adjacent to 110 2 nd St. SW, Suite 135, Auburn, WA 98001	12:01 AM	11:59 PM	1/1/2015-12/31/2015 (SMTWThFSa)
Green River College Clery Public Property for the main Campus	Public streets and all sidewalk areas bordering, surrounding or adjacent to 12401 SE 320 th Street; Public streets and all sidewalk areas bordering, surrounding or adjacent to 124 Avenue SE from the intersection of SE 320 th to and including the intersection of SE316th. Include all of Lea Hill Park.	12:01 AM	11:59 PM	1/1/2015-12/31/2015 (SMTWThFSa)
Green River College Non-Clery Public Property for the main Campus	Public sidewalks including the public street for 124 th Avenue SE from the intersection of 124 th Ave SE and SE 316 th Street to the intersection of 124 th AVE SE and the intersection of SE 312st Street. (Do NOT include any crimes committed on the private property of the 7-11 business.)	12:01 AM	11:59 PM	1/1/2015-12/31/2015 (SMTWThFSa)

In addition, if a serious crime that may cause an ongoing threat to our campus community is reported to your department, we would appreciate it if you would notify our Green River College Campus Safety Office immediately. The institution has a responsibility to notify the campus community in a timely manner about any crimes on and immediately around the campus which pose an ongoing threat to the community.

We need to have this information sent to us via email (see my email below) or by US postal mail no later than June 30, 2016. If you have any questions, please feel free to contact me. Thank you for your attention to this matter.

Kind Regards,

Handwritten initials 'DR' in a stylized, bold font.

Derek Ronnfeldt, Director
Campus Safety, Parking, and Transportation
253-288-3350
Email: dronnfeldt@greenriver.edu

Auburn
data

Joanne Martin

From: Derek Ronnfeldt
Sent: Friday, June 10, 2016 6:47 PM
To: Joanne Martin
Subject: Fwd: Records Request 16-1231

Sent from my iPhone

Begin forwarded message:

From: Ashley Payment <apayment@auburnwa.gov>
Date: June 10, 2016 at 5:41:39 PM PDT
To: "dronnfeldt@greenriver.edu" <dronnfeldt@greenriver.edu>
Cc: "cturner@greenriver.edu" <cturner@greenriver.edu>
Subject: Records Request 16-1231

Hi Derek and Chris:

Below is the information provided by our Crime Analyst Joe Ryan. Please let me know if you need any additional clarification or information.

Ashley

No qualifying crimes occurred on the dates and times noted for all of the below non-campus locations:

Auburn Library (1102 Auburn Way S) from 6 PM to 8:30 PM on Mondays and Wednesdays between 1/5/2015 and 3/20/2015
Auburn Library (1102 Auburn Way S) from 6 PM to 8:30 PM on Mondays and Wednesdays between 3/30/2015 and 6/12/2015
Auburn Library (1102 Auburn Way S) from 6 PM to 9 PM on Mondays and Wednesdays between 6/22/2015 and 12/11/2015
Auburn Library (1102 Auburn Way S) from 6 PM to 8:30 PM on Mondays and Wednesdays between 9/21/2015 and 12/11/2015
Auburn Memorial Stadium (711 E Main St) from 4 PM to 5:30 PM from 2/1/2015 to 5/31/2015
Mount Baker Middle School (620 3th St SE) from 6 PM to 8:30 PM on Tuesdays and Thursdays between 1/5/2015 and 3/20/2015
Mount Baker Middle School (620 3th St SE) from 6 PM to 8:30 PM on Tuesdays and Thursdays between 3/30/2015 and 6/12/2015
Olympic Middle School (1825 K St SE) from 6 PM to 8:30 PM on Tuesdays and Thursdays between 9/21/2015 and 12/11/2015

On Campus Locations:

GRCC Downtown Auburn Campus (110 2nd St SW) for all days and all times during calendar year 2015:
No qualifying crimes occurred at this address

We do not have the ability to search sidewalk areas or anything of that nature. If the crime occurred on the sidewalk immediately next to his address it would have likely been noted as having occurred at that address.

GRCC Main Campus (12401 SE 320th St) for all days and all times during calendar year 2015:

We do not have the ability to search sidewalk areas or roadways specifically. Addresses of crimes are chosen by the closest addressed location.

Burglary: Three total offenses //
Simple Assault: Four total offenses
Auto Theft : Six total offenses
Harassment: One total offense
Sexual Offense (Voyeurism): One total offense
Verbal Domestic Argument: One total offense

Joe

Joe Ryan
Crime Analyst - Auburn Police Department
340 E Main St Suite 201 Auburn, WA
jryan@auburnwa.gov
(253) 288-4307 (Desk)
(253) 261-5548 (Cell)



From: Ashley Payment
Sent: Friday, May 27, 2016 9:15 AM
To: Joe Ryan
Subject: RE: Records Request

Yes, that is there deadline they need this information by. But when I am were sending an additional time needed letter (because the initial estimate was May 31) I need to put in a date that the City of Auburn anticipates completing the request. I can put any date, but I just need to know what date you estimate completing this request.

Thanks!

From: Joe Ryan
Sent: Friday, May 27, 2016 9:11 AM

To: Ashley Payment
Subject: RE: Records Request

Two weeks is fine on my end but I don't think they are expecting until late June right?

From: Ashley Payment
Sent: Friday, May 27, 2016 9:10 AM
To: Joe Ryan
Subject: RE: Records Request

I can send a follow up acknowledgement for additional time, but I need an estimated completion date. 2 weeks would be June 10, is that a good time frame to give the requestor?

From: Joe Ryan
Sent: Friday, May 27, 2016 9:06 AM
To: Ashley Payment
Subject: RE: Records Request

If it is ok with you I will push this on my end a few weeks (suspense is end of June on the request)?

From: Joe Ryan [mailto:jryan@auburnwa.gov]
Sent: Wednesday, April 20, 2016 8:51 AM
To: Ashley Payment
Cc: Chris James
Subject: RE: Records Request

Sounds good. Thanks!

Joe

From: Ashley Payment
Sent: Wednesday, April 20, 2016 8:50 AM
To: Joe Ryan
Cc: Chris James
Subject: RE: Records Request

Hi Joe,

I spoke w/ Chris Turner, he works with Derek Ronnfeldt and is the Campus Safety Manager at GRCC. He confirmed they only need the total number of crimes, not the case numbers.

Thanks for your help!
Ashley

From: Joe Ryan
Sent: Wednesday, April 20, 2016 8:39 AM
To: Ashley Payment
Cc: Chris James
Subject: RE: Records Request

This is a pretty hefty request and will take some time. I see the suspense date on the letter is 6/30. How about I mark it down on my end to have to you two by the end of May? Also, will total number of crimes suffice or should I be tracking individual case numbers as well?

Joe

From: Ashley Payment
Sent: Tuesday, April 19, 2016 1:16 PM
To: Joe Ryan
Cc: Chris James
Subject: Records Request

Please see the attached request for various Crime Statistics. The request is from GRCC. Let us know if you need any additional information or clarification.

Ashley Payment
Records Clerk
City of Auburn
25 W Main St
Auburn, WA 98001
(253) 931-3005

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Exhibit B

The following pages highlight several crimes that were misclassified by GRC. The examination of the College's incident reports, and, in some cases, the Auburn Police Department's incident reports, confirmed that the College neglected to classify crimes in accordance with the FBI's Uniform Crime Reporting Guidelines as required.

The tables below were created using information from GRC's incident reports and the College's classification of these crimes (highlighted in the light brown shading). The correct classification for each incident is highlighted in yellow as determined from reading both the College's and local law enforcement incident reports. This exhibit is to be used in conjunction with Finding #7: Failure to Report Crimes by the Uniform Crime Reporting Program.

2008	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks
1	1037	2/8/2008	2/8/2008	Aggravated Assault	Off-campus	Rape		Misclassification - student reported she was drugged and raped.
2	1027	1/23/2008	1/23/2008	Stu. Conduct Viol.	Unknown	Terroristic Threats		Misclassification
3	1046	2/8/2008	2/8/2008	Informational	Unknown Off campus	Sex Offense		Misclassification - student reported being drugged and naked.
4	1048	2/23/2008	2/23/2008	Informational	Student Housing Bldg. T	Liquor Law Viol.		Misclassification
5	1073	3/30/2008	3/30/2008	Informational	Science Tech. Bldg. B	Attempted Burg.	AP8018034	Misclassification
6	1129	5/28/2008	5/28/2016	Informational	Student Housing Bldg. K	Drug Violation		Misclassification - controlled drug substance was in the room.
7	1130	5/28/2008	5/28/2016	Stu. Conduct Viol.	Student Housing Bldg. L	Drug Violation		Misclassification - controlled drug substance paraphernalia in the student's room.
8	1140	6/22/2008	6/22/2008	Informational	Student Housing Bldg. K	Liquor Law Viol.		Misclassification - Underage possession of alcohol.
9	1294	11/18/2008	11/18/2008	Informational	Off campus shuttle bus	Harassment		Misclassification - incident occurred on the shuttle bus.
10	1314	11/18/2008	11/18/2008	School Prop Vand.	Rutkowski Learning Ctr.	Hate Crime		Misclassification - Bias statement written on Students door
11	1328	12/10/2008	12/10/2008	Harassment	Holman Library Bldg.	Sexual Assault		Misclassification - Forcible Fondling
2009	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks

12	1338	1/3/2009	1/3/2009	Aggravated Assault	Student Housing Bldg. L	Assault	Misclassification - incident report does not reflect this as an Aggravated Assault. Should be classified as a simple assault.
13	1492	4/8/2009	4/7/2009	Harassment	Holman Library Bldg.	Sex. Harassment	Misclassification - student reported she was sexually harassed.
14	1520	4/28/2009	4/28/2009	Personal Prop Theft	Student Housing Bldg. K	Burglary	Misclassification - TV was stolen from an unattended apartment/student residence.
15	1524	4/30/2009	4/30/2009	Informational	Student Housing Bldg. K	Burglary	Misclassification - two males entered a student residence while he was asleep. The two males left once the student awoke.
16	1529	5/2/2009	5/2/2009	Uncategorized	Student Housing Bldg. T	Simple Assault	Misclassification - Driver was throwing cups of water hitting students.
17	1539	5/7/2009	5/7/2009	Harassment	Science Math Tech Bldg.	Sex. Harassment	Misclassification - Subject put his arm around the student without consent.
18	1562	5/22/2009	5/22/2009	Uncategorized	Student housing Bldg. B	Burglary	Misclassification - Breaking and entering into a student's on campus residence while the victim was asleep. Nothing was taken during this attempted burglary.
19	1580	5/29/2009	5/29/2009	Harassment	Off campus	Simple Assault	Misclassification - An individual threw a can of coke at another student on 124th - next to campus.
20	1585	6/2/2009	6/2/2009	Informational	Holman Library Bldg.	Theft	Misclassification - Student

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								attempted to take a book from the library.
21	1587	6/2/2009	6/2/2009	Informational	Lindbloom Student Center	Sex. Harassment		Misclassification : Verbal sexual comments made to student
22	1591	6/6/2009	6/6/2009	Informational	Student Housing Bldg.	Theft		Misclassification - Student anonymously reported a theft of a wallet.
23	1632	7/14/2009	7/14/2009	Personal Prop Theft	Student Housing Bldg. B	Burglary	09-08534	Misclassification - Individual entered a student residence while unattended and stole a laptop.
24	1636	7/28/2009	7/27/2009	Harassment	Science Math Tech Bldg.	Sexual Assault		Misclassification -Student touched the victim on her leg and rubbed her pelvic region.
25	1708	10/1/2009	10/1/2009	Stu Cond. Rule Viol.	Admin Bldg.	Sex Harassment		Misclassification - A student posted a sexually suggestive poster on a professor's car.
26	1732	10/8/2009	10/8/2009	Uncategorized	Lindbloom Student Center	Robbery		Misclassification - Two individuals threaten to rob an armed Loomis guard at the ATM on campus.
27	1744	10/14/2009	10/14/2009	Robbery	Off campus	Theft	09-12406	Misclassification - Student stole a cell phone from another student's bag in the classroom on GRC Clery Geography.
28	1753	10/20/2009	10/20/2009	Informational	Holman Library Bldg.	Theft		Misclassification - Student attempted to steal a book from the library.
29	1775	10/28/2009	10/28/2009	Harassment	Off Campus	Assault		Misclassification - An individual jumped out of his vehicle and ran over to hit another individual several times.
30	1783	11/2/2009	10/29/2009	Red Flag	Science Math Tech Bldg.	Sex. Harassment		Misclassification - A student made unwanted sexual comments to a female student.
31	1839	12/8/2009	12/8/2009	Personal Prop Theft	Student Housing Bldg. M	Burglary		Misclassification : Apartment door kicked in items stolen

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32	1840	12/9/2009	12/9/2009	Personal Prop Theft	Student Housing Bldg. H	Burglary		Misclassification - Subject stole money from a student's residence.
2010	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks
33	2305	9/28/2010	9/28/2010	Informational	Performing Arts	Voyeurism	10-11452	Professor videotaped a female student changing clothes in the women's dressing room
34	2382	11/8/2010	11/8/2010	Assault	Parking Lot P8	Aggravated Assault with a knife	10-13136	Classified as a simple assault and should have been classified as an aggravated assault since a weapon was involved. TW was sent.
2011	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks
35	2725	4/9/2011	4/9/2011	Personal Property Theft	Student Housing G	Burglary	11-E00276	Misclassification as a theft.
36	2857	5/31/2011	5/31/2011	Assault	Student Housing Bldg. L	Two (2) Aggravated Assaults - one with knife (attempted) and once with cigarette (burn)	11-05880	Misclassification - Should have been an Aggravated Assault.
37	2893	6/21/2011	6/21/2011	Drug Law Violation	Student Housing F	Aggravated Assault with weapon. He tased her, it was heard and reported, weapon found.	11-06707	Misclassification - This was aggravated assault on the hierarchy rule.
2012	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks
38	3416	10/23/2012	10/23/2012	School Property Theft	Salish Hall	Burglary	12-11919	Burglary and not a theft
2013	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks
39	3550	3/11/2013	3/11/2013	Assault	Parking Lot P1	Sexual Assault	13-2686	Misclassification - A student patted another student's buttock.
40	3573	3/30/2013	3/28/2013	Personal Prop. Theft	Student Housing Bldg. M	Burglary		Misclassification - An iPhone was stolen from a student's residence.
41	3595	4/25/2013	4/24/2013	Assault	Rutkowski Learning Center	Sexual Assault	13-4668	Misclassification - Student touched a female's crotch in the classroom.
42	3599	4/23/2013	4/17/2013	School Property Vand.	Humanities Bldg. C	Burglary		Misclassification - vandalism and stolen property.
43	3685	7/10/2013	7/10/2013	Uncategorized	Abel Loop/Dead Horse Canyon	Suicide		Misclassification - A person was found dead. Possibly by hanging.
2014	Report #	Date Reported	Date Occurred	GRC'S Classification	Location	Clery Classification	Police Case No.	Remarks

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44	3813	1/13/2014	1/13/2014	Harassment	Student Housing L	Forcible Fondling (hot spot)		Misclassification - Harassment took place prior to the forcible sexual assault.
45	3938	4/18/2014	4/18/2014	Informational	Lindbloom Student Center	Aggravated Assault		Assault with rock - thrown at head
46	3900	3/18/2014	3/18/2014	Altercation	Trades Center Construction site	Aggravated Assault	14-03525	Fight took place at the on campus site. Victim taken to hospital for exam. Subjects fired 3 gun shots and then ran through the campus. Campus Security issued a lockdown 49 minutes later.
47	3951	4/30/2014	4/30/2014	School Property Theft	Rutkowski	Burglary	14-E00434	Burglary not a theft.
48	4112	8/30/2014	9/8/2014	Larceny	Lindbloom Center	Burglary		Burglary and not a Larceny
49	4200	10/13/2014	10/13/2014	School Property Theft	Salish Hal	Burglary	14-E01010	Burglary not a theft.
50	4210	10/17/2014	10/16/2014	School Property Theft	International Village Bldg. C	Burglary	14-E01026	Burglary not a theft.
51	4211	10/17/2014	10/16/2014	Assault	Salish Hal	Attempted Sexual Assault/Harassment/Threats		Forcible Sexual Assault
52	4221	10/21/2014	10/7/2014	School Property Theft	Rutkowski Learning Center	Burglary	14-E01042	Burglary not a theft.
53	4223	10/22/2014	7/26/2014	School Property Theft	Rutkowski Learning Center	Burglary	14-E01051	Burglary not a theft.
54	4234	10/26/2014	10/26/2014	School Property Theft	Salish Hal	Burglary	14-E01079	Burglary not a theft.
55	4240	10/27/2014	10/25/2014	School Property Theft	Salish Hal	Burglary	14-E01092	Burglary not a theft.
56	4241	10/28/2014	10/27/2014	School Property Theft	Salish Hal	Burglary	14-E01080	Burglary not a theft.
57	4248	10/30/2014	10/30/2014	School Property Theft	Salish Hal	Burglary	14-E01091	Burglary not a theft.
58	4337	12/5/2014	12/4/2014	School Property Theft	Rutkowski Learning Center	Burglary	14-E01219	Burglary not a theft.
59	4338	12/5/2014	12/4/2014	School Property Theft	International Village Bldg. C	Burglary	14-E01229	Burglary not a theft.
60	4339	12/5/2014	12/5/2014	Informational	Cedar Hall	Burglary	CH room 206	Burglary not informational
61	4357	12/11/2014	12/11/2014	School Property Theft	Rutkowski Learning Center	Burglary	14-E01239	Burglary not a theft.

Total Number of Misclassifications:

61

Exhibit C

Finding #8: Failure to Report Crime Statistics by Location

The following table was created based upon a review of both the College's incident reports, as well as the incident reports from Auburn Police Department's incident reports, to determine the locations in which crimes occurred. The "Remarks" column provides clarification as to the public property locations as determined by the incident reports.

Report #	Date Reported	Date Occurred	Classification	Location	Police Case No.	Remarks
1294	11/18/2008	11/18/2008	Informational	Off campus shuttle bus		Public Property at the bus stop next to campus
1426	2/23/2009	2/23/2009	School Prop Vand	Off Campus		Childcare ctr in GRCC geography
1497	4/17/2009	4/17/2009	Informational	Off campus		Childcare ctr in GRCC geography
1504	4/19/2009	4/19/2009	School Prop Vand	Off campus		Public Property occurred next to Childcare center
1558	5/17/2009	5/17/2009	School Prop Vand	Off campus		Incident occurred on Childcare prop. GRCC Clery geog.
1580	5/29/2009	5/29/2009	Harassment	Off campus		Misclas. Ind threw can of coke at a stu on 124th E. to camp.
1610	6/22/2009	6/22/2009	Informational	Off Campus		Fire in garbage can 320th St. May be on Pub. Prop
1621	7/2/2009	7/2/2009	Stu Cond, Rule Viol	Off Campus		2 Stu Arguing: Inc at the Auburn Ctr, GRCC geography
1744	10/14/2009	10/14/2009	Robbery	Off campus	09-12406	Misclas. Stu stole cell ph from stu bag - in class GRCC geo.
1785	11/4/2009	11/4/2009	Informational	Off Campus		Inc. occurred at Childcare Ctr - in GRCC geography
2217	6/29/2010	6/29/2010	Robbery	Off campus	10-07635	Public Property-bus stop on campus
2448	12/30/2010	12/30/2010	Theft	Off campus	10-15227	Public Property-bus stop on campus
2875	6/7/2011	6/7/2011	Robbery	Off campus	11-06177	Public Property- on sidewalk next to the CCA
2961	8/15/2011	8/15/2011	Robbery	Off campus	11-08810	Public Property-bus stop on campus
2968	8/24/2011	8/24/2011	Robbery	Off campus	11-09169	Public Property-bus stop on campus
3313	6/5/2012	6/5/2012	Robbery	Off campus	12-06002	Public Property-sidewalk on SE 320st.
3316	6/6/2012	6/5/2012	Robbery	Off campus	12-06020	Public Property-bus stop on campus
3318	6/6/2012	6/6/2012	Robbery	Off campus		Public Property-basketball courts in the adjacent park.
3325	6/8/2012	6/8/2012	Robbery	Off campus		Public Property-124 and CCA
3368	8/24/2012	8/24/2012	informational	Off campus		Public Property in front of the Child care Center
3370	8/29/2012	8/29/2012	Informational	Off campus		Marj. Plants found near campus - May be GRCC geog.
3458	11/23/2012	11/21/2012	Robbery	Off campus		Occurred on 320th bus stop - May be GRCC geography
3459	11/26/2012	11/21/2012	Robbery	Off campus		Inc. occurred on 312th past food mark. - Maybe GRCC's
3705	8/15/2013	8/15/2013	Robbery	Off campus	13-09282	Public Property- Corner of SE 320th St. and 124th Ave.
3707	8/11/2013	8/11/2013	Robbery	Off-campus	13-09440	Public Property- Corner of SE 320th St. and 124th Ave.
3711	8/20/2013	8/20/2013	Robbery	Off Campus	13-E00717	Public Property- Corner of SE 320th St. and 124th Ave.
3816	1/17/2014	1/18/2104	Robbery	Off campus		Public Property - 124th AVE
3817	1/19/2014	1/19/2014	Robbery	Off campus	14-00853	Public Property-sidewalk next to CCA
3961	5/7/2014	5/7/2014	Altercation	Off Campus	14-05733	Aggravated Assault/Public Property/ 320th and 124th
4216	10/18/2014	10/18/2014	Assault	Off Campus	14-13757	31900 block of SE 124th AVE

Exhibit D

Finding #9: Failure to Maintain an Accurate and Complete Crime Log

The following issues were identified in GRC's crime log entries for incidents of crime reported as occurring between 8/21/2015 and 10/9/2015:

1. The crime log is labeled as the "Weekly Clery Report," evidencing the Security Department's long-time practice of only updating the daily crime log on a weekly basis rather than the required practice of updating any criminal incidents within two business days of their report.
2. No update was provided for the week of September 11th (a Friday), creating a two-week period during which no updates to the crime log appear to have been made. Once the College did provide an update on September 18th, it included crimes that were reported on September 11th, 14th and 15th. In total, five crimes were not reported within the required two-day period.
3. No disposition field was included in the crime log.

WEEKLY CLERY REPORT

8/21/2015

GRCIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4689	8/14/2015	8/14/2015	12:35 AM	1:15 AM
4690	8/15/2015	8/15/2015	10:32 AM	2:54 PM
4691	8/15/2015	8/15/2015	1:28 PM	3:15 PM
4692	8/17/2015	8/17/2015	8:45 AM	9:16 AM
4693	8/17/2015	8/17/2015	1:30 PM	2:00 PM
4694	8/19/2015	8/19/2015	2:44 AM	2:46 AM
4695	8/19/2015	8/19/2015	11:27 AM	12:41 PM
4696	8/19/2015	8/19/2015	2:38 PM	7:43 PM
4697	8/20/2015	8/20/2015	4:11 AM	3:45 AM

WEEKLY CLERY REPORT

8/21/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Auto Accident - Hit and	Parking Lot P13	<input type="checkbox"/>	15-10490
Trespass	Student Housing Bldg. T	<input type="checkbox"/>	
Informational	Parking Lot P12	<input type="checkbox"/>	14-12609
Suspicious Circumstance	Technology Center	<input type="checkbox"/>	
Drug Law Violation	Student Housing Bldg. T	<input type="checkbox"/>	
Disturbance	Off-campus Location	<input type="checkbox"/>	AB150059297
Drug Law Violation	Student Housing Bldg. L	<input type="checkbox"/>	
Auto Accident		<input type="checkbox"/>	15-10724
Suspicious Circumstance	Off-campus Location	<input type="checkbox"/>	

WEEKLY CLERY REPORT

8/28/2015

GROIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4698	8/22/2015	8/22/2015	8:00 PM	8:28 PM
4699	8/27/2015	8/27/2015	9:11 AM	9:25 AM

WEEKLY CLERY REPORT

8/28/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Uncategorized	Parking Lot P15	<input type="checkbox"/>	
Drug Law Violation	Student Housing Bldg. B	<input type="checkbox"/>	

WEEKLY CLERY REPORT

9/4/2015

GRCIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4700	8/29/2015	8/29/2015	19:24	21:53
4701	8/30/2015	8/31/2015	2:30	15:40
4702	8/31/2015	8/31/2015	19:55	20:47
4703		9/1/2015		9:00
4704	9/1/2015	9/1/2015	16:12	16:17
4705	9/2/2015	9/2/2015		9:00

WEEKLY CLERY REPORT

9/4/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Auto Accident	Student Housing Bldg. A	<input type="checkbox"/>	15-11203
Informational	Administration Bldg.	<input type="checkbox"/>	
Informational	Student Housing Bldg. T	<input type="checkbox"/>	
School Property Theft	Salish Hall	<input type="checkbox"/>	
Auto Accident - Hit and	Parking Lot P15	<input type="checkbox"/>	
RSO	Administration Bldg.	<input type="checkbox"/>	

WEEKLY CLERY REPORT

9/18/2015

GRCIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4710	9/11/2015	9/11/2015	20:05	21:30
4711	9/14/2015	9/14/2015		7:15
4712	9/13/2015	9/14/2015	21:30	15:56
4713	9/14/2015	9/14/2015	17:30	18:18
4714	9/15/2015	9/15/2015	4:38	4:39
4715	9/16/2015	9/16/2015	1:56	1:57
4716	9/16/2015	9/16/2015	13:50	14:00
4717	9/16/2015	9/16/2015		

WEEKLY CLERY REPORT

9/18/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Medical Aid	Student Housing Bldg. T	<input type="checkbox"/>	N/A
Personal Property Vand	Maintenance Compound	<input type="checkbox"/>	
Informational	Student Housing Bldg. A	<input type="checkbox"/>	
Medical Aid	Parking Lot P5	<input type="checkbox"/>	
Informational	Student Housing Bldg. L	<input type="checkbox"/>	
Trespass	Parking Lot P15	<input type="checkbox"/>	
Informational	Rutkowski Learning Center	<input type="checkbox"/>	
		<input type="checkbox"/>	

WEEKLY CLERY REPORT

9/25/2015

GROCCidentID	DateOccured	DateReported	TimeOccured	TimeReported
4718	9/18/2015	9/18/2015	23:35	23:38
4719	9/21/2015	9/21/2015	9:58	11:50
4720	9/22/2015	9/22/2015	7:50	7:30
4721	9/23/2015	9/23/2015	11:25	12:00
4722	9/23/2015	9/23/2015	17:16	17:55

WEEKLY CLERY REPORT

9/25/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Liquor Law Violation	Student Housing Bldg. M	<input type="checkbox"/>	
Auto Accident	Parking Lot P8	<input type="checkbox"/>	
Informational	Salish Hall	<input type="checkbox"/>	
Informational	Center at Kent	<input type="checkbox"/>	
Harassment	Administration Bldg.	<input type="checkbox"/>	

WEEKLY CLERY REPORT

10/2/2015

GRCIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4723	9/25/2015	9/25/2015		9:40
4724	9/25/2015	9/25/2015		9:40
4725	9/26/2015	9/26/2015	11:30	11:30
4726	9/26/2015	9/26/2015	22:10	22:10
4727	9/28/2015	9/28/2015	10:44	11:49
4728	9/25/2015	9/28/2015	18:30	19:00
4729	9/29/2015	9/29/2015	11:35	11:35
4730	9/29/2015	9/29/2015	15:35	15:45
4731	9/29/2015	9/29/2015	21:17	21:17
4732	9/30/2015	9/30/2015	18:20	18:37
4733	10/1/2015	10/1/2015	10:00	11:05
4734	10/1/2015	10/1/2015	11:59	12:55

WEEKLY CLERY REPORT

10/2/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
RSO	Administration Bldg.	<input type="checkbox"/>	
RSO	Administration Bldg.	<input type="checkbox"/>	
Suspicious Circumstance	Off-campus Location	<input checked="" type="checkbox"/>	
Illegal Weapons Possess	Parking Lot P15	<input type="checkbox"/>	
School Property Theft	Off-campus Location	<input type="checkbox"/>	
School Property Theft	Gymnasium	<input type="checkbox"/>	
Informational	Lindbloom Student Center	<input type="checkbox"/>	
Auto Accident	Parking Lot P8	<input type="checkbox"/>	N/A/black
Moving Violation	Parking Lot P14	<input type="checkbox"/>	
Drug Law Violation	Student Housing Bldg. T	<input type="checkbox"/>	
Auto Accident	Parking Lot P1	<input type="checkbox"/>	
Nonforcible Sex Offense	Cedar Hall	<input type="checkbox"/>	

WEEKLY CLERY REPORT

10/9/2015

GRCIncidentID	DateOccured	DateReported	TimeOccured	TimeReported
4738	10/2/2015	10/2/2015	10:55	12:10
4739	10/4/2015	10/4/2015	7:41	12:17
4740	10/5/2015	10/5/2015	7:30	7:30
4741	10/5/2015	10/5/2015		13:34
4742	10/5/2015	10/5/2015	18:45	21:00
4743	10/5/2015	10/5/2015	22:00	23:00
4744	10/6/2015	10/6/2015	10:08	10:18
4745	10/6/2015	10/6/2015	11:22	11:55
4746	10/6/2015	10/6/2015	12:35	13:00
4747	10/6/2015	10/6/2015	19:00	19:54
4748	10/7/2015	10/7/2015	8:30	9:48
4749	10/2/2015	10/7/2015	1:00	1:00
4750	10/7/2015	10/7/2015		
4751	10/7/2015	10/8/2015	15:20	11:20
4752	10/8/2015	10/8/2015	15:10	15:20
4753	10/8/2015	10/8/2015	21:04	21:04
4754	10/8/2015	10/8/2015	18:11	18:11
4755	10/8/2015	10/8/2015	16:15	16:30
4756	10/8/2015	10/8/2015	17:35	17:35

WEEKLY CLERY REPORT

10/9/2015

IncidentTypeID	LocationID	PoliceNotified	KC_CaseNo
Medical Aid	Center at Kent	<input type="checkbox"/>	
Informational	Trades Bldg. A	<input type="checkbox"/>	
Auto Accident - Hit and	Parking Lot P1	<input type="checkbox"/>	
Personal Property Theft	Science Bldg.	<input type="checkbox"/>	
Auto Accident - Hit and	Parking Lot P13	<input type="checkbox"/>	AP150072113
Informational	Student Housing Bldg. B	<input type="checkbox"/>	
Assault	Student Housing Bldg. F	<input type="checkbox"/>	
Medical Aid	Lindbloom Student Center	<input type="checkbox"/>	
Assault	Salish Hall	<input type="checkbox"/>	
Damage to School Prop	Student Housing Bldg. M	<input type="checkbox"/>	15-12923
Informational	Center at Kent	<input type="checkbox"/>	
Liquor Law Violation	Student Housing Bldg. T	<input type="checkbox"/>	
Assault	Off-campus Location	<input type="checkbox"/>	
Suspicious Person	Salish Hall	<input type="checkbox"/>	
Illegal Weapons Possess	Student Housing Bldg. G	<input type="checkbox"/>	N/A
Medical Aid	Off-campus Location	<input type="checkbox"/>	
Medical Aid	Lindbloom Student Center	<input type="checkbox"/>	N/A
Harassment	Lindbloom Student Center	<input type="checkbox"/>	
Public Intoxication	Holman Library Bldg.	<input type="checkbox"/>	N/a