Clery Act Compliance Assessment Executive Summary

Background
Mt. San Antonio College contracted with Margolis Healy & Associates, LLC to conduct an assessment of its compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Statistics Act (Clery Act). Margolis Healy sent three team members to Mt. SAC in December to interview key campus members and to review multiple documents that are required of a college or university to maintain compliance with the Clery Act. Margolis Healy provided a 78 page draft report for review in March.

Findings
The report format describes three main categories: 1) policy disclosure; 2) records collection and retention; and 3) information dissemination. Margolis Healy wrote, "Mt. SAC has several challenges regarding Clery Act compliance, and should aggressively implement the recommendations in this report to address these challenges, and enhance its overall compliance." They continued, "...the Clery Act is an institutional responsibility and that compliance relies on coordination and collaboration across several areas of the College. This concept underpins the need for a Clery Coordinating Committee, along with the appropriate capacity to manage the Clery Act program."

The report identified four major themes for Mt. SAC to address. The first theme is Campus Security Authorities (CSAs). A CSA is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution. Mt. SAC has made some recent improvements in this area but needs to be better at notifying and training CSAs on campus.

The second theme is training, specifically with regard to the many facets of the Violence Against Women Act (VAWA). The recommendation is to have executive level overview training for the College leadership group, in-depth administrator and leadership training for those overseeing CSAs or ensuring Clery compliance, and specific CSA training for anyone who meets the definition of a CSA.

The third theme is creating a Clery Coordinator position and forming a Clery coordinating committee. Maintaining Clery compliance is a significant function that should be led by someone at a management level position to ensure cooperation of campus community members.

The fourth theme is Timely Warnings and Emergency Notifications. The process for issuing both messages should be streamlined and a clear policy should be established for the instances in which the messages should be issued.

The majority of the report addresses observations about the College’s compliance with specific sections of the Clery Act. Sixty pages of the report describe a Clery requirement, an observation of Mt. SAC’s compliance, and recommendations for improvement. Margolis Healy made a total of 79 recommendations. Not all of these areas would constitute a violation but they could be performed in a more efficient manner. There were several areas of compliance where Margolis Healy did not have any recommendations for improvement.

Conclusion
Margolis Healy was complimentary of Mt. SAC’s efforts toward Clery compliance but identified several areas where the College can improve. We will improve this year’s Annual Security Report (ASR) as well as the other areas of compliance that need to be addressed throughout the year. We will strive to have a more cohesive committee to address Clery compliance and implement the recommendations made in the report. The draft report has been reviewed and we are awaiting the final report which will include sample documents for us to review and adopt if we so choose.