

September 18, 2009

Mr. James Moore
Department of Education
Federal Student Aid, Philadelphia School Participation Team
The Wanamaker Building
100 Penn Square East, Suite 511
Philadelphia, Pa. 19107

Re: Program Review Report
OPE ID: 00332700
PRCN: 200910326869

RECEIVED

SEP 23 2009

FEDERAL STUDENT AID

Dear Mr. Moore;

In response to the Department of Education's review of the Slippery Rock University Police Department, the following information is provided to ensure the Department of Education that the University Police Department is committed to full compliance with the provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and maintains a dedication to campus safety and security; along with full disclosure of incidents that occur within the parameters established by the Department of Education.

For expediency and continuity, the responses and corrections taken by the Slippery Rock University Police Department will be addressed in chronological order.

Finding # 1: *Failure to Properly Classify and Disclose Crime Statistics*

During the review and exit interview, the Department of Education cited the SRUPD for improperly coding two incidents from 2007 as theft/larceny incidents, when according to definition they should have been coded as burglaries. At the conclusion of the exit interview with the Department of Education, it was agreed that there was a mislabeling of the reports and it resulted in an under-reporting of the burglary category by two, based upon the review. To correct the situation, the statistics provided to the Campus security act were changed from a report of one (1) burglary for calendar year 2007 to three (3) for calendar year 2007. In addition, the official police reports were re-classified from Theft to Burglary for each incident. As proof of these changes, this response includes a Photostatic copy of the department's security statistics that are included in the annual security report and a Photostatic copy of each crime report enumerated in the department of education's findings. The annual security report can also be reviewed by accessing the University Police Department's website at:
<http://www.sru.edu/police>

In addition, in order to ensure that mis-classifications do not take place in the future, the SRU police department has instituted periodic roll-call training to familiarize our officers and dispatch

personnel on the Jeanne Clery Act and the need to properly classify reported crimes for accurate disclosure to the University Community. Officers have been instructed to seek assistance from supervisors or other administrative personnel, when situations arise in which they may be unsure or the proper classification, rather than mis-classify an incident. A copy of the "Handbook for Campus Crime Reporting" is available for each officer to review, and it is situated at the Dispatch Desk for easy access. Additionally, shift supervisors are required to review each incident and crime report to ensure they are coded correctly and all pertinent information is included in the report. Additionally, Captain Roger Knight, the department's investigator and Clery officer reviews each report to ensure that our officers and supervisors are following the tenets of the Clery Act. Captain Knight has been serving in this role for approximately 4 years, and is familiar with the necessity of accurate reporting. Additional reviews are conducted by the A/Chief of Police and the Chief of Police to ensure continuity and appropriate classification.

Finding #2: Failure to Report Separately for Non-Contiguous Locations

Prior to the review, the Slippery Rock University Police department had not done a separate geographic breakdown of crime statistics for non-contiguous properties that are under the University ownership, and the Department of Education specifically cited the Miller Tract, the Old Stone House Museum and the McKeever Environmental Center. The Slippery Rock University Police Department has diligently gathered crime statistics for all properties associated with the university and has included those statistics in the annual Crime Reporting Statistics; but they have not been listed in separate categories.

The following is a listing of properties that are utilized for educational purposes by the Slippery Rock University:

- Slippery Rock University Campus proper that includes all buildings, facilities, athletic fields, maintenance areas and green areas.
- Properties that are not on the campus proper, per se; but are immediately adjacent to the campus include:
 - *The Counseling & Educational Psychology building* located on East Cooper Street. This building is alarmed to the University Police Department and patrolled by the University Police and is situated across E. Cooper Street adjacent to the campus proper.
 - *The Economic Community Development Building* is also located on East Cooper Street. Again, this building is alarmed and patrolled by the SRUPD and is immediately adjacent to campus.
 - *Fowler Building* is located on Elm Street and is also alarmed and patrolled by the SRUPD. The Fowler Building is situated perpendicular from the campus proper and sits across the campus proper across Main Street.
- The *Miller Tract* - is located in Slippery Rock Borough and is a parcel of land that on occasion is used for an outdoor activity. There are no structures on that property, and it is a wooded and undeveloped area. The Slippery Rock University Police Department patrols this locale and in the event of an emergency, would be the first responder. For the Miller Tract, we will now add a caveat to our crime statistics that indicating that "non-campus property includes, but is not limited to the Miller Tract", for clarification purposes. (This was done based on a phone consultation with Mr. James Moore of the Department of Education).
- *The Old Stone House Museum* – is a University museum that is not operated on a continual basis. This Museum is located approximately 2.5 miles from the campus and during the summer

months host re-enactments and visitors on weekends. Volunteer students staff the facility when visitors are scheduled. There is a maintenance house on the property that houses a university employed care-taker. The property is patrolled by the University Police and intrusion alarms are directed to the University Police Department. Henceforth the University shall list this as a separate entity on the annual security report.

- *McKeever Environmental Learning Center* – Is situated in Sandy Lake, Pennsylvania. The Sandy Lake Police Department handles patrol of the area. The SRUPD annually obtains pertinent statistics from that department to include in the Annual Security report, and this property shall also be listed separately in the annual security report.
- *Regional Learning Alliance* - is a separate learning facility of the University and is located in Marshall Township, Allegheny County and is patrolled by the Northern Regional Police Department. The SRUPD annually obtains pertinent crime statistics from the Northern Regional Police Department and will now list this as a separate non-contiguous building with its own statistic grid.

Finding # 3: *Failure to Distribute the Campus Security Report as Required*

During the review audit by the Department of Education, the SRUPD did in-fact supply the DOE with an e-mail documentation dated October 30, 2008 that was two-fold in nature. First it was meant to notify the campus community that the updated statistics were available for review on-line at the SRUPD website and that hard copies (paper) were also available at the police station. Secondly, and the primary purpose for the correspondence, there was a request and reminder to Campus Security Authorities of their obligations to report information to the police department. The decision to combine the two functions was done by the previous police administration, and admittedly failed to adequately notify the campus community of the available crime statistics in a timely manner. It should be noted for this response that the Campus Security Report had been completed and was posted on the SRU website prior to October 1, 2008.

To comply with the provisions of the Clery Act, the SRUPD has adopted new procedures to ensure that the university is in full compliance with the tenets of the Clery act and to avoid any future confusion. The following items have changed and are included in a revised Campus Security Report Directive (# 74) that is attached to this response:

- ❖ The department shall no longer produce a two-pronged approach to notifying the campus community and requesting information about incidents.
- ❖ The SRUPD shall remind Campus Security Authorities of their obligations three times per year. Approximately 6 weeks prior to the compilation of the annual Crime Report, the SRUPD shall remind the designated CSA's of their obligations and the need to report.
- ❖ Early in the School year (first week of September) the SRUPD shall notify all members of the Campus community to include all students, faculty, administrators, and staff of an obligation to report incidents to the police department.
- ❖ A second notification will be sent to all students, faculty, administrators, and staff in the early phase of the second semester in January of each year, to ensure new students and staff personnel are aware of their obligations to report incidents.
- ❖ The Campus Security Report will be completed and posted on the University website and a comprehensive announcement shall be made to the University community, by September 15th of each calendar year concerning the availability to review the crime statistics.

Finding # 4: Failure to Maintain an Accurate and Complete Daily Crime Log

During the review, the Department of Education determined that two incidents of crimes that had been reported to the university police department and were under our patrol jurisdiction were omitted from the Daily Crime Log/Blotter.

In order to alleviate any future problems, our policies have been updated to include the designation of the Assistant Chief of police as assuming the responsibility and duties of publishing the crime blotter on a daily basis after a review of the appropriate police reports that have been called into the department and are enumerated in the CODY report management system. Directive # 4 "Crime Log (Blotter)" is included in the submission of this response for review by the Department of Education.

COMPLIANCE:

The Slippery Rock University Police Department is committed to full compliance with all of the provisions and canons of the Jeanne Clery Act and the proper disclosure of all incidents that occur within the Slippery Rock University and associated properties. The review and audit that was conducted by the Department of Education is considered as a positive learning experience for the Slippery Rock University Police Department in our quest to maximize our professionalism and worth to the University community. Since that review, the police department has engaged in detailed conversations among the administrative staff of the department that has led to a variety of research into the provisions of the Clery act, to ensure full conformity.

In furtherance of our commitment, the Slippery Rock University Police Department has implemented the new campus safety requirements for hate crime reporting, emergency response and evacuation procedures, missing student provisions, and the fire safety issues for on-campus residential facilities effective with the 2009 Campus Security Report, rather than wait until the required October 1, 2010 date.

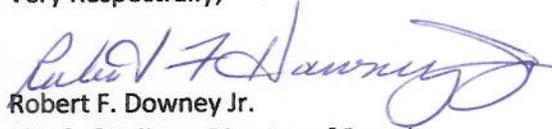
To complete our response to the Department of Education, the following items have been included for review by the Department of Education:

- SRUPD Directive # 4 - "Crime Log (Blotter)" Directive
- SRUPD Directive # 5 - "Timely Warnings - Crime & Safety Alerts" Directive
- SRUPD Directive #64 - "Emergency Notification Plans - 'Timely Warnings'" Directive
- SRUPD Directive # 73 - " Reports of Missing Students - 'Suzanne's Law'" Directive
- SRUPD Directive # 74 - "Campus Security Report" Directive
- Letter to Campus Security Authorities to be sent 3 times per year
- Copy of e-mail sent on August 5th, 2009 to the Campus Security Authorities
- Copy of incident report 07-000817 that was originally coded as a theft (under-reporting) and changed to a Burglary after review by the Department of Education
- Copy of incident report 07-023724 that was originally coded as a theft (under-reporting) and changed to a Burglary after review by the Department of Education
- Listing of the Campus Buildings and facilities that are enumerated on the Campus website to include non-contiguous buildings.

- Copies of the 2009 SRUPD website that includes the 2009 Campus Security Report with the appropriate corrections and updates as indicated in this response. This includes further evidence of updated statements as applicable for the reporting provisions.

In the event that further clarification of our desire for full and complete compliance is necessary, please contact the Slippery Rock University Police Chief at 724-738-4545 at your convenience. Please accept our sincere appreciation for the time and information provided through this review and audit.

Very Respectfully;



Robert F. Downey Jr.
Chief of Police – Director of Security

cc :

Dr. Robert M. Smith, Ph.D.
Dr. Constance Foley, Ph.D., Vice President of Student Life
Ms. Patty Hladio, Director of Financial Aid, SRU

Enclosures