



- c. Were there any incidents considered for inclusion in the statistics, and then excluded? What was the basis for excluding the incident?
- d. How does the institution deal with student complaints regarding the statistics?
- e. What method does the institution use to classify crimes committed on campus as defined by 34 CFR 668.47 (f)?

2. Provide the following documents:

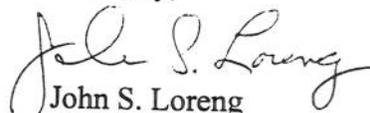
- a. The institution's Campus Security Report due September 1, 1995;
- b. The institution's Campus Security Report due September 1, 1996; and
- c. All relevant back up documentation related to the referenced incident. Back up documentation is anything an institution used to construct its statistics and can include, but is not limited to, local police and campus security incident reports, data collected by officials with significant responsibility for student and campus activities.

Please submit this information to the following address by October 3, 1996.

Ms. Nancy P. Klingler  
Acting Regional Director  
Student Financial Assistance Programs  
3535 Market Street, Room 16200  
Philadelphia, PA 19104

Thank you in advance for your cooperation in this matter.

Sincerely,

  
John S. Loreng  
Branch Chief, Region III

cc: Dr. Lannie Cross  
Vice President for Student Affairs  
Dr. Julie Sina  
Director of Financial Aid

RECEIVED

AUG 19 1996



**Security On Campus, Inc.**  
215 West Church Road, Suite 200  
King of Prussia, Pa. 19406-3207

**Please Reply to:**

S. Daniel Carter  
7505 Granda Drive  
Knoxville, TN 37909-1730  
tele: (423) 693-4316  
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sdcarter@online.knoxnews.com

OFFICE OF STUDENT FINANCIAL  
ASSISTANCE

August 14, 1996

tele: (610) 768-9330

fax: (610) 768-0646

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Ms. Nancy Klingler, Acting Director  
U.S. Dept. of Education-Region III Office  
3535 Market Street, Room 16200  
Philadelphia, PA 19104

Re: *Campus Security Act*

Dear Ms. Klingler:

As you are aware, allegations of non-compliance with the *Campus Security Act* are to be directed to the Department of Education's various regional offices and it is with that in mind that we are filing this inquiry. A possible case of non-compliance has been brought to our attention and we wanted to confirm with your office whether or not this set of circumstances would be considered non-compliance and if yes if it would warrant further investigation?

Former Virginia Tech student [redacted] recently offered testimony before a Congressional subcommittee which indicated that although she was raped three times on campus in one September 1994 night that only two sex offenses were reported by the school for that calendar year. We have corresponded with the campus police department to inquire about those two incidents and they have confirmed that those reports are not related to the [redacted] case.

As you may already be aware, the allegations were handled by an internal disciplinary committee and were never reported to the campus police. One of the suspects was found guilty and it is clear that officials with "significant responsibility for student and campus activities" were aware of the reported incidents. According to the May 1996 "Dear Colleague" letter regarding the Act, an "institution is not relieved of compliance with the reporting requirements of the campus security regulations when the institution refers a matter to a disciplinary committee, rather than to the institution's law enforcement unit or directly to the local authorities." That would seem to apply to this case.

The campus law enforcement unit argues that although they are aware of this case, they did not have sufficient information to use FBI Uniform Crime Reporting standards as is provided for by 34 CFR §668.47 (b)(3). However a lack of release of information to the campus police would not seem to exempt such incidents from being reported in annual statistics even if that means using UCR definitions to keep records in the disciplinary committee and tabulating them separately from those kept by the campus police which is apparently not being done.

Your assistance with this matter would be greatly appreciated.

Sincerely,

S. Daniel Carter

c.c.: David A. Longanecker  
Eileen N. Wagner

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October 10, 1996

Ms. Nancy P. Klingler  
Acting Regional Director  
Student Financial Assistance Programs  
3535 Market Street, Room 16200  
Philadelphia, PA 19104

re: Complaint Letter from Security on Campus, Inc.

Dear Ms. Klingler:

Please allow this letter and the enclosed materials to serve as the response from President Torgersen at Virginia Tech to a letter of inquiry which was dated September 20, 1996 and was authored by John S. Loreng, Branch Chief-Region III. In the response materials which follow, you will find:

1. a copy of Loreng's letter with our notation of a time extension (per telephonic communication);
2. the answer to paragraph 1 (a) of that letter;
3. the answer to paragraph 1 (b) of that letter;
4. the answer to paragraph 1 (c) of that letter;
5. the answer to paragraph 1 (d) of that letter;
6. the answer to paragraph 1 (e) of that letter with a five-page attachment;
7. a copy of Virginia Tech's Campus Security Report due September 1, 1995;
8. a copy of Virginia Tech's Campus Security Report due September 1, 1996;
9. a position statement and copies of relevant documentation related to the referenced incident; and
10. a position statement concerning our commitment to following the Campus Security Act and relevant documentation related to that commitment.

I hope these materials assist you in reviewing our efforts. If I can provide further information or be of any further assistance to you, please feel free to contact me.

Cordially,



Elyzabeth Holford  
Director, EOAA