

Yale University

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Federal Student Aid
School Participation Team NE - Philadelphia
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Attn: Mr. Donald L Tantum and Mr. James L. Moore, III

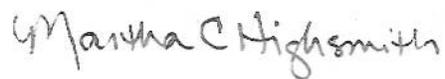
Dear Messrs. Tantum and Moore:

As requested in the April 12, 2010 Program Review Report (PRCN: 200730326836) prepared by the Department's Federal Student Aid office and transmitted to President Richard C. Levin, Yale University performed a comprehensive and institutional self-study of its systems for compliance under the Clery Act for the period January 1, 2006 to July 1, 2010 (the "Self-Study"). I was appointed to lead a task force composed of other University officials with responsibilities under the Clery Act (the "Task Force"). The Task Force examined and assessed each of the seven areas of Clery Act compliance enumerated in the Program Review Report. The detailed results of this self-study are presented in this Institutional Self-Study Report. To ensure the objectivity and exhaustiveness of the Self-Study, the University Audit Department conducted a separate, internal audit of the University's policies and procedures for compliance with the Clery Act and reported to the Task Force. In addition, the University engaged a consultant and leading expert on the Clery Act to conduct an independent and comprehensive review of the University's Clery Act compliance systems. The opinion letter received from the consultant is included as Attachment A in the Institutional Self-Study Report.

Providing a safe and secure campus for our students, faculty, staff, and visitors is a matter of the highest priority for the University. We understand the critical importance of this responsibility and continually strive to improve upon our safety and security measures. The campus is patrolled by a dedicated University police force, the Yale Police, consisting of 85 trained and fully sworn police officers and a round-the-clock police dispatch center. The Yale Police Department works in close cooperation with local, state, and federal law enforcement agencies. In addition, a separate private security force, composed of 108.5 full-time employed guards and 27 alarm station personnel, administers campus theft-deterrent programs, monitors campus security technologies, and provides round-the-clock student escort and lock-out services.

Yale University appreciates the assistance of the U.S. Department of Education over the years in helping with our efforts to report fully and completely under the Clery Act. We have found the advice and recommendations provided by the Federal Student Aid Division of the Department, combined with guidance in the Department's *Handbook for Campus Crime Reporting* and online training materials, immensely helpful. We look forward to continuing our work with the Department to keep our campus and community safe.

Sincerely,



Martha C. Highsmith
Deputy Secretary of the University

**INSTITUTIONAL SELF-STUDY REPORT
ON CLERY ACT COMPLIANCE**

**Yale University
Office of the Vice President and Secretary**

July 9, 2010

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Section One: Identification of reportable incidents

1.a. The stated policy in place January 1, 2006 to July 1, 2010

Crime statistics for the annual disclosure are collected from two primary sources: (i) the New Haven and Yale Police Departments, and (ii) school officials with knowledge of formal and informal complaints and disciplinary referrals. University officials assemble the police reports and, using a directory of campus-owned and occupied property and a map that combines campus and city areas coded by property type, review each report to determine the geographic category (on-campus, on-campus residential, non-campus, public) in which incidents fall. When there is doubt whether a crime is reportable owing to its location, the University errs on the side of including the crime, in an effort to provide useful and informative data. With regard to the school officials, reports are solicited twice a year. The campus officials are informed that any complaint, allegation, or incident falling into the reportable categories (arson, murder, manslaughter, aggravated assault, sex offenses, robbery, burglary, and motor vehicle theft) that is described to them must be reported, regardless of whether any particular informal or formal investigative process is pursued.¹

1.b. The procedure for identifying reportable incidents in place January 1, 2006 to July 1, 2010

As outlined in the policy, the procedure for identifying all incidents reportable under the Clery Act consists of two major steps: (1) determining the University's campus, campus residential, non-campus and public properties as defined in the Clery Act (collectively, "Clery Geography"); and (2) classifying incidents that occurred on Clery Geography as criminal homicide (including murder, non-negligent manslaughter and negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes, illegal weapons possession, and drug and liquor law violations as defined in the Clery Act (collectively, "Clery Offenses"). The Office of the Vice President and Secretary ("Office of the Secretary"), which administers the University's Clery Act compliance system, oversees the process of making these determinations and classifications, as described below.

Determining Clery Geography

Yale University's Clery Geography is determined by review of each one of the approximately 600 properties and facilities appearing on a master property and facilities list ("Master Property List"). The Master Property List is generated from an electronic database maintained in the University's Office of New Haven and State Affairs and Campus Development. That Office identifies, records and tracks all of the transactions for real estate used in support of the University's educational mission as well investment and commercial properties located in Connecticut. It does not track out-of-state real estate holdings that are part of the University's investment portfolio and not used for the University's educational and institutional purposes.

¹ All policy statements denoted in italics throughout this Report are quoted verbatim from the University's 2005-2008 Annual Campus Security Reports ("ACSR") unless otherwise noted.

The Master Property List includes the address and name, if applicable, of all such properties and facilities owned, operated, and/or leased by the University and a use designation, as applicable, for each property or facility. When a new property or facility is acquired, leased or otherwise controlled by the University, it is added to the Master Property List, and, if located in New Haven, its addition is reported to the Yale Police Department ("YPD") for entry into the computer aided police dispatch (CAD) system that is also used by the New Haven Police Department ("NHPD"). See Section Three of this Report for further information on this CAD system.

From the Master Property List, the Office of the Secretary has generated another list used specifically for Clery Act reporting (the "Property List for Clery Reporting"). This list includes the properties and facilities on the Master Property List, and, in addition to address, name and use designations, each property and facility is also designated as a Clery Geography property or as "not Clery." Properties that do not fall under Clery Geography, such as investment property, commercial property not used in support of the University's educational mission, and housing property for senior administrators, are listed as "not Clery" on the Property List for Clery Reporting. The YPD and the Office of the Secretary annually review the programmatic use of each property and facility on the Property List for Clery Reporting to make the appropriate categorization of each such property and facility as campus, campus residential, or non-campus as defined in the Clery Act and as instructed in the *Handbook for Campus Crime Reporting*. The Property List for Clery Reporting is attached as Attachment B.

The University recognizes that its use of certain properties and facilities may change from year to year depending on changing programmatic needs. For this reason, the Office of the Secretary and the YPD annually review the Property List for Clery Reporting to assess changes based on use and user(s) and then make appropriate updates to that list. For example, the Office of the Secretary and the YPD review whether commercial eating establishments originally intended to serve only as investment property for the University have been designated as University-approved vendors where students can use their meal plan dollars; they consult with property managers to determine whether University-owned apartment buildings made available for rent to the general public are being rented primarily to graduate students of the University; and if demand for housing in the residential colleges (which serve as dorms for undergraduates) exceeds supply in a given year, they identify any nearby apartment buildings that are not ordinarily used for student housing but that are being used temporarily as residential college annex housing. For each of these usage changes, during the period of the re-purposing, the relevant property or facility's designation from "not Clery" would be re-classified under the appropriate Clery Geography category on the Property List for Clery Reporting.

The University also is aware that University-recognized student organizations use properties that are not owned, leased or controlled by the University. These properties are not tracked in the Master Property List. Accordingly, the YPD annually reviews the lists of University-recognized student organizations to determine if those organizations have locations that should be included on the Property List for Clery Reporting. For those student organizations officially recognized by the University and which own or control properties or facilities in and around the campus, the locations of such organizations are designated as non-campus property, pursuant to the instructions in the *Handbook for Campus Crime Reporting*.

To determine “public property” as defined in the Clery Act, the Office of the Secretary uses a large-scale map of campus properties (“Campus Map”) that the Office of New Haven and State Affairs and Campus Development converts electronically from the Master Property List. The Campus Map shows all campus properties and facilities owned, controlled, or leased by the University. The Office of the Secretary and the YPD use the Campus Map in conjunction with the Property List for Clery Reporting, because the Campus Map is color-coded to ownership and use designations set forth in the Master Property List and not according to Clery Geography. The Campus Map is included as Attachment C to this Report.

As described in further detail in Section Three, item 1.b. of this Report, when determining if an incident has occurred within the University’s Clery Geography, the Office of the Secretary and the YPD review the Property List for Clery Reporting, make updates to the list according to the procedures described above, and determine if the location at which the incident was reported to have occurred matches a property or facility listed as campus, campus residential or non-campus property on the list. If there is no match, then they examine the Campus Map to make a visual determination as to whether the location at which an offense has occurred is public property as defined by the Clery Act. When the Campus Map does not clearly indicate whether the location of a reported incident can be classified accurately as Clery Act public property, representatives of the Office of the Secretary and YPD drive to the location in question to make an on-site determination. If an on-site determination cannot be made, the Office of the Secretary errs on the side of classifying the crime as having occurred on Clery Act public property and reporting it as such.

Classifying Clery Reportable Offenses

Once an incident is determined to have occurred within the University’s Clery Geography, representatives of the Office of the Secretary and the YPD determine if the incident is properly classified as a Clery Offense.

Crime data for the YPD and the NHPD are maintained in a CAD database used by both Departments that allows mapping of crimes by location, type, and case number. The YPD and NHPD categorize crimes according to the FBI’s Uniform Crime Reporting Handbook (“UCR”) definitions. For crime reports received from other police agencies and CSA reports, the YPD categorizes these incidents using UCR definitions. Using the CAD database, the YPD generates a list of the following crimes: criminal homicide (including murder, non-negligent manslaughter and negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes, and all reports for liquor, drug and weapons violations. In addition, the YPD uses definitions from the FBI’s National Incident-Based Reporting System Edition of the UCR and instructions provided in the *Handbook for Campus Crime Reporting* to define and separate forcible and non-forcible sex offenses. For hate crimes, the YPD follows the *Handbook’s* instructions on classifying hate crimes and consults the FBI’s Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Guide for Hate Crime Data Collection, as needed. Please see Section Three of this Report for a full description of the University’s procedures for collection and compilation of statistics.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and closely compared them with the University's policies and procedures and determined that the University has faithfully followed the procedures as described in item 1.b. above.

The Department's Program Review Report also requested that the University review any locations within the Yale-New Haven Hospital that are owned or controlled by the University for its educational purposes. The Yale-New Haven Hospital is a privately owned and controlled facility, and it is a distinct and separate corporate entity from the University, governed by its own board, with its own administration, staff, institutional policies, and security operations. It is not owned or controlled by the University. Although there is an affiliation agreement between the University and the Yale-New Haven Health System entity, that document does not address – nor is there any written agreement that gives the University – ownership, control or use of any hospital space. Nevertheless, the Task Force formed two subcommittees to review all property transactions and real estate use for the period of the Self-Study. The subcommittees conducted a thorough review of all properties owned or leased by the University, including any facilities occupied by the University and used for the University's educational purposes. To do this, the subcommittees assembled the various property and facilities usage lists managed by different facilities managers throughout the University and cross-referenced these lists with the database of the Master Property List. During the course of this review, one subcommittee identified certain University-occupied spaces contained on one list that had not been included in the Master Property List, because the University's authority to use these spaces had not been formalized in a written agreement. A thorough review of the properties and facilities on that list resulted in the identification of seven spaces (which were initially eight spaces that have been consolidated) within the Yale-New Haven Hospital where faculty in the University's School of Medicine have offices, see patients and/or conduct on-site clinical training. The eight original spaces are listed on Attachment D. These spaces now have been added to the Property List for Clery Reporting. Moreover, the Task Force gathered and reviewed YPD and NHPD crime reports for the Yale-New Haven Hospital for the period of the Self-Study and determined that no Clery Offenses occurred in these spaces or in the associated hallways and lobbies during this period.

3. Responsible officials and supervisors

The Master Property List and Campus Map is maintained and updated by the Office of New Haven and State Affairs and Campus Development.

At the direction of the Deputy Secretary, the University's Property List for Clery Reporting is reviewed and updated annually by a subcommittee consisting of the Deputy Secretary, a YPD senior lieutenant, and the YPD's Director of Strategic Analysis.

The Director of Strategic Analysis also collects and reviews the listings of University-recognized student organizations.

4. Responsible Officials and Supervisors

As discussed more fully in item 2. above, during the process of the Self-Study, the Task Force identified a weakness in the internal controls related to determining Clery Geography.

Seven spaces within the Yale-New Haven Hospital that have been used for the University's educational purposes were not included on the University's Property List for Clery Reporting since there is no written agreement governing the use of the spaces. The Task Force requested YPD and NHPD crime reports for the seven spaces for the period of the Self-Study and determined that no Clery Offenses occurred in these spaces or in the associated hallways and lobbies during the period of the Self-Study. The University believes that the Clery Act does not require reporting of these spaces, since there is no written agreement that gives the University control over these spaces. Nonetheless, the University has chosen to include the spaces in its Clery Act collection process, because students in the University's School of Medicine have been known to participate in clinical trainings in these spaces. These spaces have been designated as campus property in the University's Property List for Clery Reporting.

No violations or other internal control weaknesses were discovered in the Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

As discussed more fully in item 2. above, the University has conducted a thorough review of all properties and facilities owned, leased or controlled by the University and used in support of its educational purposes, including spaces, such as those identified in the Yale-New Haven Hospital, that are not owned or governed by a formal lease or other written agreement. Each year hereafter, the subcommittee responsible for reviewing and maintaining the Property List for Clery Reporting will include in its programmatic review of University properties and facilities for changes in the University's Clery Geography a step that involves cross-referencing the list of Yale-New Haven Hospital spaces informally occupied by the University and reviewing the programmatic use of these spaces.

6. Monitoring of changes

The Office of the Vice President and General Counsel and the University Audit Department will monitor the change described in item 5. above to ensure that the Office of the Secretary is thoroughly and comprehensively identifying reportable offenses.

7. Budgetary, staffing, training or systems impact

The addition to the University's programmatic review described in item 5. above will be absorbed into existing staff time by the Office of the Secretary and the YPD. The University does not anticipate incurring any budgetary, staffing, training or systems impact.

Section Two: Identification of CSAs

1.a. The stated policy in place January 1, 2006 to July 1, 2010

Crime statistics for the annual disclosure are collected from two primary sources: (i) the New Haven and Yale Police Departments, and (ii) school officials with knowledge of formal and informal complaints and disciplinary referrals...

1.b. The procedure for identification of CSAs January 1, 2006 to July 1, 2010

CSAs are identified as stated in the policy above, based on whether they perform the following functions: (1) their official job responsibilities involve significant interaction with students and/or campus activities; (2) they serve as informal or unofficial mentors to students; (3) they serve as a member in an office or of a committee to whom students are informed to report or discuss crimes, allegations of crimes, and other troubling situations; and/or (4) they have oversight for disciplinary procedures. The Deputy Secretary and the Associate General Counsel with Clery Act responsibilities identify individuals throughout the University who perform one or more of these functions and designate them as CSAs. The Office of the Secretary maintains a list of all CSAs (the "CSA List"), which is included in this Report as Attachment E.

Twice a year, the Deputy Secretary and the Associate Counsel examine and review the CSA List to assess changes in each individual's function, including changes in position, department or title, and whether there are newly appointed positions that meet the policy and criteria stated above; they update the CSA List accordingly. The Yale College Dean's Office routinely notifies the Office of the Secretary of any changes that may affect the CSA List. In addition, the Deputy Secretary and the Associate General Counsel meet every four to six weeks with the deans, associate and assistant deans of student affairs, registrars, and other individuals in the graduate and professional schools serving equivalent functions and, during these meetings, gather information about staffing changes that may affect the CSA List.

The Deputy Secretary provides written notification to each CSA twice a year to inform all such individuals of their responsibilities under the Clery Act and to request that they submit to the Deputy Secretary all data concerning Clery Act incidents of crime reported to them. An incident report form is provided with the written notification to facilitate the collection of statistics from CSAs. A copy of the written notification and the incident report form are attached to this Report as Attachment F. If a response is not received from a CSA, the Deputy Secretary or a member of her staff conducts follow-up calls or emails. Copies of all notices to CSAs and incident report forms are filed and stored in the Office of the Secretary. The compilation of statistics collected from CSAs and other sources is detailed in Section Three below.

Since the University's undergraduate residential housing system varies from that of most colleges and universities, a description of that system and how it is related to the identification of CSAs is included here.

Undergraduate students are assigned to one of twelve residential colleges, each consisting of approximately 250 - 400 students. The residential colleges allow students to experience the cohesiveness and intimacy of a small school while still enjoying the cultural and scholarly resources of a large university. They function as small, self-contained communities, each with its own dining hall, common room, study rooms, library, workout spaces, media entertainment

rooms, and art, music, and sports facilities. Every residential college has its own master and dean, both of whom are University faculty members. The master and dean live in the college with their families and eat their meals with students in the dining hall. The master is the chief administrative officer and the presiding faculty presence in each residential college. He or she is responsible for the physical wellbeing and safety of students in the residential college, as well as for fostering and shaping the social, cultural, and educational life and character of the college. During the year, he or she hosts lectures, study breaks (especially during finals), and Master's Teas—small gatherings during which students have the opportunity to engage with renowned guests from the academy, government, or popular culture. The dean serves as the chief academic and personal adviser to students in his or her residential college. Students submit course schedules or drop courses through the residential college dean's office. If a student is having difficulty with a particular course, the college dean can often help by talking with the student's instructor or with the relevant department's director of undergraduate studies, or by referring the student to one of the tutoring programs administered by each residential college. Getting to know all residential college students as individuals helps the dean to address their concerns as personally and effectively as possible. For these reasons, masters and deans are designated as CSAs. Owing to the small living community provided by the residential colleges, the University does not have residence hall advisors of the kind found on many college and university campuses.

Undergraduate students may also turn for assistance to the Dean of Student Affairs of Yale College, other Assistant and Associate Deans of Yale College who have significant responsibility for student and campus activities, including the Assistant Deans who oversee the University's many cultural centers, and athletic coaches. These individuals, the Associate Dean who chairs the undergraduate student disciplinary committee, called the Yale College Executive Committee, and the Chair of the Sexual Harassment Grievance Board are also CSAs. Likewise, the deans and officials of each of the graduate and professional schools who serve the functional equivalent of such positions for their students are also designated as CSAs, including the deans of student affairs who oversee student disciplinary cases in their respective programs and the Title IX coordinators for these schools. In addition, students seek guidance from the following offices: the Sexual Harassment and Assault Resources & Education (SHARE) Center, the Office of International Students and Scholars, the Office of Disability Services, and the School of Medicine's Office of the Ombudsperson. The heads of these offices are designated as CSAs as well.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and *Handbook for Campus Crime Reporting* and closely compared them with the University's policies and procedures for the identification of CSAs and determined that the University has faithfully followed the procedures as described in item 1.b. above.

3. Responsible officials and supervisors

The Deputy Secretary and the Associate General Counsel jointly identify CSAs and update the CSA List as described in item 1.b. above. The Deputy Secretary supervises these functions.

The Deputy Secretary provides written notifications and incident report forms to CSAs twice a year. Her office also conducts follow-up calls or emails with CSAs if their response is not received and files and stores written notices and incident report forms.

4. Violations or weakness of internal controls

No violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

While there are no violations or internal control weaknesses to address, the following changes have been or will be made, as indicated below, to increase assurance of continued compliance.

- In 2004, the CSA List was expanded to include the University's Sexual Harassment Grievance Board ("SGHB"). See Section Three, item 5. of this Report for details on the University's disclosure of SGHB findings.
- In addition, the University has collected data from the University's Sexual Harassment and Assault Resources & Education (SHARE) Center since its creation in 2007. SHARE counselors, who are part of the Mental Health and Counseling Department at Yale University Health Services, are available to talk to students or meet with them 24 hours a day, 7 days a week. The SHARE Center also offers online advisory brochures on sexual assault, sexual harassment, intimate partner violence and stalking. See Section Three, item 5. of this Report for details on the University's disclosure of SHARE Center data.
- Upon advice of the Task Force, the Deputy Secretary and the Associate General Counsel will create Clery Act reference documents to capture in writing the content of existing trainings for annual distribution to all CSAs.
- Beginning with our ACSR for calendar year 2009, the University will include in its policy statement for the identification of CSAs the following definition of CSAs (which the University has been using to identify CSAs, but has not previously included in its ACSR): *Individuals at Yale are designated as CSAs based on whether they perform the following functions: (1) their official job responsibilities involve significant interaction with students and/or campus activities, (2) they serve as informal or unofficial mentors to students, (3) they serve as a member in an office or of a committee to whom students are informed to report or discuss crimes, allegations of crimes, and other troubling situations, and/or (4) they have oversight for disciplinary procedures.*

6. Monitoring of changes

The Deputy Secretary and the Associate General Counsel will continue to update the CSA List as needed to ensure that all relevant positions are included in the solicitations for reportable incidents under the Clery Act. The Office of the Vice President and General Counsel and the University Audit Department will annually review the procedures for identification of CSAs described in this Section Two and confirm that changes described in item 5. above are properly implemented.

7. Budgetary, staffing, training or systems impact

Counselors were reassigned in 2007 from the Yale University Health Services' Mental Health and Counseling Department to staff the SHARE Center. The University does not anticipate incurring any other budgetary, staffing, training or systems impact.

Section Three: Collection and compilation of statistics

1.a. The stated policy in place January 1, 2006 to July 1, 2010

Crime statistics for the annual disclosure are collected from two primary sources: (i) the New Haven and Yale Police Departments, and (ii) school officials with knowledge of formal and informal complaints and disciplinary referrals. University officials assemble the police reports and, using a directory of campus-owned and occupied property and a map that combines campus and city areas coded by property type, review each report to determine the geographic category (on-campus, on-campus residential, non-campus, public) in which incidents fall. When there is doubt whether a crime is reportable owing to its location, the University errs on the side of including the crime, in an effort to provide useful and informative data. With regard to the school officials, reports are solicited twice a year. The campus officials are informed that any complaint, allegation, or incident falling into the reportable categories (arson, murder, manslaughter, aggravated assault, sex offenses, robbery, burglary, and motor vehicle theft) that is described to them must be reported, regardless of whether any particular informal or formal investigative process is pursued.

1.b. The procedure for collecting and compiling statistics in place January 1, 2006 to July 1, 2010

As outlined in the policy, the procedure for collecting and compiling statistics reportable under the Clery Act consists of the following steps: (1) collection of all reportable incidents of crime from sources required by the Clery Act; (2) determining whether such incidents occurred on Clery Geography and are also Clery Offenses; and (3) cross-referencing all Clery Act reportable incidents of crime to eliminate duplicate reporting.

Before any statistics are collected, however, the Office of the Secretary updates the Property List for Clery Reporting by cross-referencing it with the University's Master Property List (both lists are fully described in Section One, item 1.b. of this Report). This step is performed to ensure that real estate transactions that occurred throughout the previous year, and which affect Clery Act disclosure obligations, are properly tracked in the Property List for Clery Reporting.

The Office of the Secretary oversees the collection and compilation of statistics. Initially, reports of incidents of crime are gathered from an area wider than the geographic areas required by the Clery Act in order to make certain that no Clery Act reportable incidents are inadvertently overlooked. The following reports are collected every year:

- All YPD crime reports

Collection procedure: The YPD gathers reports of all crimes, including all allegations of crimes, which were reported to have occurred within the patrol jurisdiction of the YPD. Please see Attachment G for the map of the YPD patrol jurisdiction.

- All NHPD reports of crime that (1) occurred within the YPD patrol jurisdiction or (2) occurred at a New Haven location, outside the YPD patrol jurisdiction, that is owned or controlled by the University.

Collection procedure: The YPD collects hardcopies of all NHPD reports of crimes, including allegations of crimes, which were either reported to have occurred within the boundaries of the YPD patrol jurisdiction or were reported to have occurred at any property in New Haven that is owned or controlled by the University. The YPD and the NHPD use the same computer aided police dispatch (CAD) system, which gives the University ready access to data for all crimes reported in New Haven that are potentially reportable under the Clery Act. Using the CAD database, the YPD generates a list of the following crimes: criminal homicide (including murder, non-negligent manslaughter and negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes, and all reports for liquor, drug and weapons violations. The CAD system is used in conjunction with a mapping software program and the Property List for Clery Reporting.

- All crime reports from jurisdictions other than New Haven in which a crime, or allegation of crime, is reported to have occurred on property the University owns or controls in support of its academic mission, which is reported as Clery Act non-campus property. These jurisdictions include: Beacon Falls, Bethany, Branford, Brookfield, Canaan, Derby, Farmington, Greenwich, Guilford, Hamden, Hartford, Ledyard, Milford, Norfolk, North Branford, North Haven, Norwich, Old Lyme, Orange, Union, and West Haven.

Collection procedure: The YPD writes a letter annually to the state and local law enforcement agency in each of these jurisdictions to solicit statistics on crime that were reported to have occurred on University owned or controlled properties listed on the Property List for Clery Reporting. A sample copy of this letter is included as Attachment H to this Report. Letters are sent out with ample time to provide the agencies with sufficient time to collect the information and respond. Responses are received by the YPD. If responses are not received from a jurisdiction, the YPD will conduct follow-up calls and document such calls in writing. Copies of all letters and communications, including all responses from state and local police agencies, are filed and stored in the YPD.

- All reports from CSAs (see Section Two of this Report for a full description of the identification of CSAs)

Collection procedure: As described more fully in Section Two, each CSA receives a written request, twice a year, notifying and/or reminding him or her of CSA responsibilities under the Clery Act and directing timely submission of information concerning Clery Act offenses reported to him or her. An incident report form is provided to assist with this data collection. Please see Attachment F for a sample copy of the written notification and incident report form. CSAs are instructed to submit data concerning all incidents of crime reported to them, including incidents that were not reported to law enforcement authorities and reports from individuals who wish to remain anonymous. With the exception of the Yale College Executive Committee's CSA report, all CSA reports are submitted to the Office of the Secretary. Copies of all letters, communications and forms are filed and stored in the Office of the Secretary. Incident reports from the Yale College Executive Committee are collected by the Office of the

Vice President and General Counsel. The function of the Yale College Executive Committee as a CSA is described in Section Two of this Report.

Following collection of data concerning all Clery Act reportable incidents, the University reviews every reported offense, regardless of the source of the report, to determine (1) whether it meets the Clery Act definitions for reportable offenses for criminal homicide (including murder, non-negligent manslaughter and negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes in the required Clery Act crime categories, and disciplinary referrals for illegal weapons possession and drug and liquor law violations and (2) whether it occurred within the geographic areas designated by the Clery Act for reporting: on-campus, on-campus residential, non-campus and public property. The type of Clery Act offense is determined by the YPD. (The total number of crimes reported in Yale's ACSRs differs from that reported in its UCR report to the FBI due to differences between the Clery Act and UCR crime definitions and to the Clery Act's requirement to report by geographic categories.) The Clery Act geography determination is made by a subcommittee constituted of representatives of the YPD and the Office of the Secretary. That subcommittee considers those incidents identified as meeting Clery Act crime definitions and matches them with any applicable Clery Act geography properties that are listed on the University's Property List for Clery Reporting or that are identified as Clery Act public property through use of the University's Campus Map. The Property List for Clery Reporting and the Campus Map are attached as Attachments B and C.

Following the subcommittee's initial classification of reportable incidents in Clery Act crime and geography categories, the Office of the Secretary conducts a second review to ensure that the incidents have been accurately classified. The Office of the Vice President and General Counsel annually audits reported incidents to provide an additional assurance of accuracy. Those audits consist of making an independent determination of Clery Act classifications with regard to a randomly selected, significant sample of original data.

YPD, NHPD and CSA reports are all cross-referenced in order to identify incidents that may have been reported to multiple sources and to minimize duplicate reporting of incidents in the ACSR. Incidents reported by CSAs that were not reported to, or investigated by, law enforcement are included in the University's Clery Act data. Although the University makes every effort to avoid duplicative reporting, the University's policy is to err on the side of including possibly duplicate reports if University officials are unable to determine with certainty whether the same incident was reported to more than one source.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and compared them closely with the University's policies and procedures for the collection and compilation of statistics and determined that the University has faithfully followed the procedures as described in item 1.b. above, with the exception of the following:

- As discussed in Section One of this Report, the University had not included the collection of statistics for those seven spaces within the Yale-New Haven Hospital that the

University informally occupies for its educational purposes. The Property List for Clery Reporting has been revised to include these spaces as on-campus property, although reporting for these spaces is not required by the Clery Act or its regulations. Although no Clery Act offenses occurred in these spaces or in the associated hallways and lobbies during the period of the Self-Study, if they were to occur in any such spaces in the future, they would be reported as having occurred in on-campus property in the University's ACSR.

- During the course of an independent and comprehensive review of the University's Clery Act compliance systems conducted by a consultant and leading expert on the Clery Act engaged by the University, the consultant identified one error in the reported statistics in the University's ACSR for calendar year 2008. In the illegal weapons possession category, an arrest involving two individuals was reported as one incident rather than two. Documentation on the original police report indicates that the subcommittee responsible for identifying Clery Act reportable incidents (described in item 1.b. above) had determined that the arrest was to be counted as two incidents, but the data were mistakenly recorded in the ACSR and the Department's crime security data analysis website as one instead of two incidents. The consultant concluded that "[t]his mistake was due to human error and not a lack of understanding of the requirements." The consultant's opinion letter is included in this Report as Attachment A. The University will revise and re-publish the 2008 statistics with the 2009 ACSR to correct this error.

3. Responsible officials and supervisors

Under the direction of the Deputy Secretary, the University's Property List for Clery Reporting is reviewed and updated annually by a subcommittee consisting of the Deputy Secretary, a YPD senior lieutenant with 21 years of combined experience as a police officer in both the NHPD and YPD, and the YPD's Director of Strategic Analysis.

Under the supervision of the Chief of the YPD, the YPD senior lieutenant described above and the Director of Strategic Analysis gather statistics from the YPD and the NHPD. The YPD senior lieutenant also collects statistics from law enforcement agencies outside of New Haven.

The Deputy Secretary collects all CSA reports, with the exception of the reports of the Yale College Executive Committee, which are collected by the Associate General Counsel.

Under the supervision of the Chief of the YPD, the YPD senior lieutenant and the Director of Strategic Analysis categorize reported incidents of crime into the different types of Clery Act offenses.

Under the supervision of the Deputy Secretary, a subcommittee consisting of the YPD senior lieutenant, the Director of Strategic Analysis, the Chief of the YPD and the Deputy Secretary matches those crimes identified as meeting Clery Act crime definitions with any applicable Clery Act geography properties that are listed on the University's Property List for Clery Reporting or identified as Clery Act public property through use of the University's Campus Map.

As described in item 1.b. above, the University conducts its review of statistics for reportable incidents in two stages, each involving different officials to ensure accurate reporting and to reduce instances of duplicate reporting. The Deputy Secretary, in consultation with the YPD senior lieutenant and the Director of Strategic Analysis, conducts the first stage of the review. The Associate General conducts the final review of reportable incidents.

4. Violations or weakness of internal controls

As described in Section One of this Report and item 2. of this Section, the University has revised its Property List for Clery Reporting to include seven spaces occupied by the University for its educational purposes that are located within the Yale-New Haven Hospital. The University believes that the Clery Act does not require reporting of these spaces, since there is no written agreement that gives the University control over these spaces. Nonetheless, the University has chosen to include the spaces in its Clery Act collection process, because students in the University's School of Medicine have at times participated in clinical activities in these spaces. The Task Force reviewed all YPD and NHPD crime reports for the seven spaces for the period of the Self-Study and determined that no Clery Offenses occurred in these spaces or in associated hallways and lobbies during this period.

Also described in item 2. above, one error in the reported statistics for the illegal weapons violation category in the University's ACSR for calendar year 2008 was identified during the course of the Self-Study by an independent consultant, who conducted a comprehensive review of the University's Clery Act compliance systems. Corrected 2008 data will be published with the 2009 ACSR. The consultant's opinion letter is included as Attachment A.

No other violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

The Office of the Secretary has implemented changes to address the University's internal control weakness in not having previously cross-referenced its Property List for Clery Reporting with one particular listing of University-occupied space in the Yale-New Haven Hospital. These changes are described in Section One, item 5 of this Report.

The University will strengthen its process of checking for data entry errors to help prevent inadvertent errors in the future.

While there are no other violations or internal control weaknesses to address, the following changes have been or will be made, as indicated below, to increase assurance of continued compliance.

- As previously discussed in Section Two, item 5. of this Report, prior to the period of the Self-Study, upon advice from, and at the direction of, the Department's Student Financial Assistance Boston Team, the Chair of the Sexual Harassment Grievance Board ("SHGB") was added to the University's CSA List in 2004. In addition, the University annually discloses the SHGB's findings online at <http://yalecollege.yale.edu/content/sexual-harassment-assault-resources>. SHGB data found on this website are not classified by Clery Act categories. Specifically, they include reports of sexual harassment as well as

sexual assault, and they include statistics on sexual assaults that occurred on private property not owned or controlled by the University.

- The CSA List has also been expanded to include the Director of the University's Sexual Harassment and Assault Resources & Education (SHARE) Center. See Section Two, item 5. for a description of the SHARE Center. Since 2007, the SHARE Center data is published annually online and may be viewed at www.yale.edu/yhp/med_services/share.html. SHARE Center data found on the Center's website are not classified by Clery Act categories. Specifically, they differ from sexual assault statistics reported in the University's ACSR's, because they include statistics on sexual assaults that occurred on private property not owned or controlled by the University.

6. Monitoring of changes

The YPD, the University Audit Department, the Office of the Secretary and the Office of the Vice President and General Counsel will monitor the changes described in item 5. above and will continue performing the University's procedure of multiple reviews and data auditing to ensure accurate collection and compilation of statistics.

7. Budgetary, staffing, training or systems impact

The position of Director of Strategic Analysis within the YPD was created and filled in 2007. The primary responsibilities of this position include crime analysis and assisting with classifying Clery Act offenses as described in this Section Three. Since other changes in procedure have been in place prior to the period of the Self-Study or will be absorbed by existing staff time, no other budgetary, staffing, training or systems impact has been or will be incurred.

Section Four: Communication and coordination with internal and external offices and agencies

1.a. The stated policy on communication and coordination with internal and external offices and agencies in place January 1, 2006 to July 1, 2010

Yale Police personnel work closely with local, state, and federal police agencies, including the FBI, Secret Service, and Department of Justice, on campus events, regional law enforcement matters, training, and main investigations. Yale has a written Memorandum of Understanding with the City of New Haven governing the relationship between the Yale and New Haven Police. The two agencies work closely together, coordinating patrols, participating together on various investigations, and sharing information. The chief of the Yale Police Department attends weekly New Haven Police staff meetings. New Haven Police notify Yale Police if a member of the Yale community is the victim of a crime within their jurisdiction.

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents to the Yale Police in a timely manner.

...

Safety on our campus depends on a partnership among police and security professionals, our students, faculty, and staff.

1.b. The procedure for communication and coordination in place January 1, 2006 to July 1, 2010

In addition to the steps outlined in the policy statement above, the University takes additional precautions to ensure strong lines of communication and coordination with internal and external offices and agencies.

Each month, the YPD conducts a Crime Analysis and Review session, referred to as CARS. These meetings include extensive data summaries on crime in and around campus, trends in crime, data comparisons with previous years, patrol activity, prisoner release, and any special initiatives. Members of the Yale Security and representatives of the NHPD attend these meetings as well.

As described in Section Three, item 1.b. of this Report, the YPD and the NHPD use the same computer aided police dispatch (CAD) system. The YPD and NHPD Chiefs meet regularly to determine each Department's police response, coded by street addresses and entered into the CAD system, which ensures the effective coordination of police response and gives the University ready access to data for all crimes reported in New Haven that are potentially reportable under the Clery Act and all crimes that occurred within the YPD patrol jurisdiction. See Attachment G for a map of the current YPD patrol jurisdiction.

The procedure for communication and coordination with law enforcement agencies outside of New Haven is described in Section Three, item 1.b. of this Report.

To ensure strong lines of communication and coordination regarding Clery Act compliance and overall crime prevention best practices within the University, the YPD Chief, the Deputy Secretary, and the Associate General Counsel meet and consult regularly with the

following individuals: school officials in the Yale College Dean's Office, deans and masters of the twelve residential colleges, Title IX coordinators, deans of student affairs in the graduate and professional schools, athletic coaches and staff, faculty, staff of the SHARE Center, and the Chairs of the Sexual Harassment Grievance Board and the Yale College Executive Committee. These individuals, in turn, coordinate and communicate information regarding the University's Clery Act compliance system with other officials and staff within their respective schools, departments and committees.

In the fall of 2009, the YPD Chief sent a welcome safety information email to all students, describing the University services in place to help keep them safe, explaining the process for timely warning notices, and providing a dedicated email address, safe@yale.edu, for students to use for questions, concerns, suggestions, and any other communications related to safety and security on campus. A copy of this email is included in this Report as Attachment I. The YPD Chief will send an updated welcome safety information email to students each fall.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and compared them closely with the University's policies and procedures for the communication and coordination with internal and external offices and agencies and determined that the University has faithfully followed the procedures as described in item 1.b. above.

3. Responsible officials and supervisors

School officials responsible for carrying out functions related to communication and coordination with internal and external offices and agencies include (but are not limited to): the YPD Chief, the Assistant YPD Chief, a YPD senior lieutenant, the Deputy Secretary, and the Associate General Counsel. The YPD Chief, the Deputy Secretary, and the Associate General Counsel are responsible for supervising the communication and coordination functions.

4. Violations or weakness of internal controls

No violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

Since no violations or internal control weaknesses were discovered, no changes were required.

6. Monitoring of changes

The YPD Chief, the Deputy Secretary, and the Associate General Counsel will continue to monitor the University's policies and procedures for communication and coordination with internal and external offices and agencies and make improvements necessary to assure continued compliance under the Clery Act.

7. **Budgetary, staffing, training or systems impact**

The University has not incurred any budgetary, staffing, training or systems impact.

Section Five: Preparation and publishing of the ACSR

1.a. The stated policy/procedure on preparation and publishing of the ACSR in place January 1, 2006 to July 1, 2010

Crime statistics for the annual disclosure are collected from two primary sources: (i) the New Haven and Yale Police Departments, and (ii) school officials with knowledge of formal and informal complaints and disciplinary referrals. University officials assemble the police reports and, using a directory of campus-owned and occupied property and a map that combines campus and city areas coded by property type, review each report to determine the geographic category (on-campus, on-campus residential, non-campus, public) in which incidents fall. When there is doubt whether a crime is reportable owing to its location, the University errs on the side of including the crime, in an effort to provide useful and informative data. With regard to the school officials, reports are solicited twice a year. The campus officials are informed that any complaint, allegation, or incident falling into the reportable categories (arson, murder, manslaughter, aggravated assault, sex offenses, robbery, burglary, and motor vehicle theft; hate crimes, and liquor, drug, and weapons violations) that is described to them must be reported, regardless of whether any particular informal or formal investigative process is pursued.

Each year, an e-mail notification is made to all enrolled students, faculty, and staff that provides the website address to access this report. Employees who do not have e-mail accounts receive a copy of the report by mail at their home address. Copies of the report are available through the Admissions Office and the Human Resources Department. Copies of the report may also be obtained at the University Police Department located at Ashmun Street. The report is posted online at <http://www.yale.edu/publicsafety>.

1.b. The procedure for preparation and publishing of the ACSR in place January 1, 2006 to July 1, 2010

Each year, prior to preparing the ACSR, representatives of the Office of the Secretary, the YPD, and the Office of the Vice President and General Counsel examine and review the Clery Act and its implementing regulations and the *Handbook for Campus Crime Reporting* to ensure that the University is complying with all Clery Act requirements. Staff of the University's Office of Federal Relations regularly monitor legislative changes and alert the Office of the Secretary, the YPD and the Office of the Vice President and General Counsel to any new Clery Act requirements (such as fire safety reporting and missing person notification). Representatives of the Office of the Secretary and the YPD also participate in campus safety and security trainings offered through the International Association of Campus Law Enforcement Administrators (IACLEA) and other campus law enforcement and security organizations and review the Department's online Campus Crime Reporting Training as part of their ongoing educational process.

Representatives of the Office of the Secretary, the YPD, and the Office of the Vice President and General Counsel regularly review the University's campus security policy statements required under the Clery Act to ensure that they accurately reflect the University's current practices, include relevant contact information, and are included in the ACSR. As an additional precautionary step, each year, the Office of the Secretary cross-references the required policy statements listed in the Department's Checklist for Clery Act Compliance (Appendix B in

the *Handbook*) with the University's ACSR policy statements before the ACSR is approved for publication.

A copy of the University's most recent ACSR, for calendar year 2008, is included as Attachment J. In addition, information on where to obtain the ACSR is included on all online and paper employment applications and in student admissions materials.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and compared them closely with the University's policies and procedures for the preparation and publishing of the ACSR and determined that the University has faithfully followed the procedures as described in items 1.a. and 1.b. above.

3. Responsible officials and supervisors

School officials responsible for carrying out functions related to the preparation and publishing of the ACSR include (but are not limited to): the YPD Chief, the Assistant YPD Chief, a YPD senior lieutenant, the YPD's Director of Strategic Analysis, the Deputy Secretary, the Associate General Counsel, and staff members in the University's Information Technology Services Department. The Associate General Counsel supervises the inclusion of policy statements required by the Clery Act in the ACSR. The Deputy Secretary supervises the overall preparation and publishing of the ACSR.

4. Violations or weakness of internal controls

No violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

While there are no violations or internal control weaknesses to address, the following changes have been or will be made, as indicated below, in order to increase assurance of continued compliance.

- Upon advice from and at the direction of the Department of Education's Student Financial Assistance Boston Team in 2004, the University added certain policy statements to the ACSR, which had been implemented at the time, but were not listed in the ACSR. In every year since 2004, the University has continued to include the list of policy statements specified by the Department's Student Financial Assistance Boston Team. See Attachment J and Attachment K for the University's ACSRs for the 2005 through 2008 calendar years.
- In the ACSR for calendar year 2007, the University added a statement about our existing policy on emergency response and notification.
- In the ACSR for calendar year 2009, the University plans to include our missing persons policy and policies relating to fire safety, both of which have already been implemented.

6. Monitoring of changes

In order to assure continued compliance with the Clery Act requirements, the Associate General Counsel reviews the Clery Act regulations and the *Handbook for Campus Crime Reporting* each year to ensure that the required policy statements are included in the ACSR.

7. Budgetary, staffing, training or systems impact

The University has not incurred any budgetary, staffing, training or systems impact.

Section Six: Preparation and issuance of timely warnings as well as proposed plans for complying with the new Emergency Notification and Missing Persons requirements

1.a. The stated policy in place January 1, 2006 to July 1, 2010

Timely Warnings:

In the event that a situation arises, either on or off campus, that, in the judgment of the Deputy Secretary, the Chief of Police, and /or the Assistant Chief of Police, constitutes an ongoing or continuing threat, a "timely warning" is issued to members of the community. The warnings are issued through the college email system to students, faculty, and staff.

The notice is also posted on the Yale Police website. Additional notifications are made by phone or in person to University Officers, deans and others closely associated with any victim of a major crime.

Emergency Notification (added in the 2007 ACSR):

The University has an emergency notification system, known as Yale Alert, that provides text, voice, and email messages to all members of the Yale community. Undergraduates are required to provide a personal and emergency phone number in order to register for classes. In addition about 90% of graduate and professional students also provide contact information. The Yale Alert system is tested annually.

The University Emergency Operations Team meets regularly to review procedures, coordinate with City officials, and practice table-top exercises and drills. The University has developed emergency response and notification procedures for major events as noted:

In the event of a shooting incident on campus, the Yale Alert system would be used to notify the campus. Public address systems and external loud speakers would also be used to reach members of the community without cell phone, visitors on campus, and others in the area. The Yale Police have a Special Emergency Response Team (SERT) that is trained and equipped to respond if we should have such a situation.

In the event of a major fire, explosion, or other situation causing extensive property damage, the Yale Police, in coordination with the New Haven Fire Department, would respond to begin immediate evacuation. Staging areas for residential facilities have been identified and would be opened to accommodate residents as conditions permit.

The University has an extensive plan that would be implemented if there were a major pandemic such as an outbreak of avian flu affecting the United States. The University would consider cancelling classes and sending home as many students as possible. Essential operations would continue, however, including service to house and feed those remaining on campus, support for critical facilities operations such as heating and cooling, and medical care for members of the Yale University Health Services and the Yale community generally. A modified version of the plan for avian flu has been implemented to address the current H1N1 pandemic.

In the event of a major hurricane, tornado, or other severe weather, the Secretary of the University would issue an alert to the campus and would activate the Emergency Operations Center (EOC) as conditions warranted.

1.b. The procedure for preparation and issuance of timely warnings in place January 1, 2006 to July 1, 2010 as well as proposed plans for complying with the new Emergency Notification and Missing Persons requirements

The University's procedure for making timely warnings is as follows:

First, any serious crime or ongoing threat affecting the University campus is reported immediately by the attending YPD officer to the YPD Chief or the Assistant YPD Chief. In addition, serious crimes or ongoing threats affecting members of the University community that occur outside the jurisdiction of the Yale Police are also reported to the YPD Chief or the Assistant YPD Chief, although sometimes the press of duties or immediate response requirements can delay this reporting.

Second, a review and timely warning determination is made: The YPD Chief, Assistant YPD Chief, and Deputy Secretary consult on a case-by-case basis to determine whether an incident poses a serious or ongoing threat to the University community. For those incidents determined to constitute such a threat, the YPD Chief issues a "timely warning" notification by email to every member of the University community, which is sent by 24-hour on-call staff in the University's Information Technology Department. Those emails are labeled with the readily identifiable subject line: "Message from the Chief." As backup, the Director of Emergency Management and staff in the Office of the Secretary are also trained and available to issue the "timely warnings."

Third, the substance of the timely warning is carefully determined: If the information is known, and if the inclusion of such information would not compromise law enforcement efforts, timely warnings include a description of the crime, its location, and injuries, if any, to the victim. In addition, the warnings generally include safety information, a request for any information about the incident, and a reminder to report crimes or concerns about potential crime to the YPD.

Finally, there is follow up: The YPD Chief monitors replies to these "timely warning" emails and responds individually to each one. An archive of "timely warnings" is posted on the YPD website at www.yale.edu/police/messages.html.

As described in Section Four, item 1.b. of this Report, in the fall of 2009, the YPD Chief sent a welcome safety information email to all students, explaining the process for "timely warning" notices and providing a dedicated email address, safe@yale.edu, for students to address questions, concerns, suggestions, and any other communications related to safety and security on campus. See Attachment I for a copy of this email. The YPD Chief will send this welcome safety information email or one substantially similar each fall to inform students about the "timely warning" process.

The University's emergency notification and evacuation procedures have been in place since late 2001. These procedures are updated regularly as new technologies are adopted and

improvements are made. The current software for the Yale Alert system has been in use since 2007, when the University acquired a software program with the capability to reach all students, faculty, and staff by text message (where applicable), cell phone, and home phone. Prior to 2007, the University used "Reverse 911" software and in-house email for emergency notifications. In 2007, the University also began converting interior fire alarms to voice evacuation systems and installing exterior speakers in locations that can broadcast messages to the entire campus.

The Yale Alert system, which consists of voice evacuation systems and communication systems through text messages, phone messages, cell phone messages, and exterior and interior loud speakers, is tested twice a year, once in the fall semester and again in the spring semester. The Director of Emergency Management is responsible for issuing emergency notifications through the Yale Alert system. In the event of an emergency, she issues a Yale Alert in consultation with the Deputy Secretary and the YPD Chief. The Director of Emergency Management also conducts monthly training sessions with each member of a communications team on the process for issuing emergency alerts. The members of this team also serve as backup in the event that she is unavailable. The Yale Alert system differs from the purpose and method of issuing Clery Act "timely warnings" described above. This system is intended to alert the community about an immediate danger to health or life safety, such as an active shooter, an explosion, or a severe weather situation. In contrast, the "timely warnings" issued by the Yale Police Chief inform the community of incidents of crime that pose a serious or continuing threat to the campus, as specified in the Clery Act regulations and the *Handbook for Campus Crime Reporting*.

A separate database includes phone numbers and email addresses for parents of undergraduate students so that they can be included in any Yale Alert communication that might affect the campus and their sons and daughters, and cause them concern.

Undergraduate students are required to provide personal and emergency contact information in order to complete registration for classes. Some graduate and professional programs require this information, as well, prior to registration; currently the University has contact information for 97% of all graduate and professional students. Faculty and staff provide contact information in an automated employee database; 91% of faculty and staff have provided contact information.

In January 2010, the Deputy Secretary sent an email to all students (residing both on and off campus), asking them to designate a contact person to be notified if they were to be reported missing. This email is included in this Report as Attachment L. That information was collected as part of the course registration process. It is available and accessible online in a secure database by registrars, officials within the Yale College Dean's Office, the Deputy Secretary, and the YPD. More information about emergency procedures, including evacuation, is available at www.yale.edu/secretary/emergency/communications.html.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and compared them closely with the University's policies and procedures for the preparation and issuance of timely warnings and the University's procedures in place for Emergency Notification and Missing Persons, and

determined that the University has faithfully followed the procedures as described in item 1.b. above, including implementing internal procedures related to the new Emergency Notification and Missing Persons requirements; the required policy statements will be published in the ACSR for calendar year 2009.

3. Responsible officials and supervisors

The YPD Chief and Assistant YPD Chief are responsible for making the initial determination to issue a timely warning. They consult with the Deputy Secretary who supervises this function. In the Deputy Secretary's absence, the Vice President and Secretary makes the determination. The Deputy Secretary also, as needed, consults with the Associate General Counsel, the Vice President and Secretary, the Dean or Deputy Dean of Yale College and other relevant University officials, who are also available to consult with the YPD Chief and Assistant YPD Chief in the absence of the Deputy Secretary. On-call ITS staff with access to all email addresses of the University community are available to send timely warnings 24 hours a day, 7 days a week, when authorized.

The Director of Emergency Management is responsible for issuing emergency notifications through the Yale Alert system, with the supervision of the Deputy Secretary.

4. Violations or weakness of internal controls

No violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

While there are no violations or internal control weaknesses to address, the University plans to make the following changes to strengthen the process of timely warnings. Although virtually all Yale employees have email, some employees use computer kiosks to check email and others may not check email at all. In these areas, which include Dining, Custodial Services, and Physical Plant departments, supervisors will be instructed to post timely warning notices in common work areas.

6. Monitoring of changes

The Office of the Vice President and General Counsel and the University Audit Department will review the procedures for timely warnings and compliance with the new policy requirements related to Emergency Notification and Missing Persons procedures to ensure that the Office of the Secretary is carrying out all requirements.

7. Budgetary, staffing, training or systems impact

The addition of new Clery Act requirements related to missing person notification has resulted in additional staff time to program our online course registration systems to include collection and retention of emergency contact and missing persons notification information. These costs have been absorbed in the day-to-day operations of the Information Technology Systems Department. The University does not anticipate incurring any budgetary, staffing,

training or systems impact for the enhancement to the University's timely warning procedures described in item 5. above.

Section Seven: Policies, procedures methods and systems for documenting compliance with each provision of the Clery Act

1. The stated policy/procedure on documenting compliance with each provision of the Clery Act in place January 1, 2006 to July 1, 2010.

The University does not have a written policy on documenting compliance with each provision of the Clery Act. The University, through the Office of the Secretary and the Office of the Vice President and General Counsel, has created systems and assigned responsibility in ways that ensure individuals, officials and departments relevant to Clery Act reporting understand the University's policies, record retention, and disclosure procedures. The University's Clery Act records and documentation are maintained and stored in hard copy and electronic format in the YPD and the Office of the Secretary for at least seven years. Such records include: Property List for Clery Reporting; Property Map; list of officially recognized student organizations; CSA List; ACSRs; copies of crime reports, including police reports from YPD, NHPD, and police in other jurisdictions where Yale owns or controls property that meets the Clery Act requirements; reports from CSAs; the daily crime logs; records for arrests and referrals for disciplinary action; timely warning notices; letters to and from state and local police agencies relating to Clery Act compliance; notices and emails to and from CSAs; copies of notices to students and employees about the availability of the ACSR; and communications with the Department regarding Clery Act compliance.

2. What was actually done January 1, 2006 to July 1, 2010

For the period January 1, 2006 to July 1, 2010, the Task Force reviewed the Clery Act regulations and the *Handbook for Campus Crime Reporting* and compared them closely with the University's systems and procedures on documenting compliance with each provision of the Clery Act and determined that the procedures described in item 1. above have been faithfully followed as described.

3. Responsible officials and supervisors

Those responsible for documenting compliance with each provision of the Clery Act include (but are not limited to): the YPD Chief, the Assistant YPD Chief, a YPD senior lieutenant, the Director of Strategic Analysis for the YPD, the Deputy Secretary, and the Associate General Counsel. The Deputy Secretary supervises the process of ensuring overall compliance.

4. Violations or weakness of internal controls

No violations or internal control weaknesses were discovered in the institutional Self-Study for the period January 1, 2006 to July 1, 2010.

5. Changes to address violations or weakness of internal controls

While there are no violations or internal control weaknesses to address, in order to increase assurance of continued compliance the Task Force will codify in a written policy the

University's documentation and recordkeeping processes summarized in item 1. above and outlined throughout this Report.

6. Monitoring of changes

The Office of the Secretary will continue to consult the Checklist for Clery Act Compliance (Appendix B in the *Handbook*) as part of a yearly internal systematic review of the policies and procedures that are detailed in this Report conducted by the Office of the Secretary, the Office of the Vice President and General Counsel, and the YPD. The University has found the Checklist to be an especially helpful tool for assuring continued compliance with the Clery Act and will be including the Checklist in its Clery Act documentation files.

7. Budgetary, staffing, training or systems impact

The University does not anticipate incurring any budgetary, training or systems impact. Respective departments will absorb the time necessary for members of the Task Force to implement the change described in item 5. above.