

Green River College Response to U.S.
Department of Education Program
Review Report
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I. INTRODUCTION

On September 25, 2017, the United States Department of Education (Department) issued to Green River College (College or GRC) a preliminary Program Review Report (PRR) that includes thirteen findings of areas that did not comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistic Act (Clery Act) and the Drug-Free Schools and Communities Act (DFSCA). The PRR also provided required actions for each finding. GRC, through a shared goal of full compliance with the Clery Act and related federal regulations, cooperated with all aspects of the Department's review process.

The Department's review focused on College records for the period 2008 through 2015. However, the College had already determined prior to the review process that Clery compliance processes needed improvement, and many improvements had already been implemented to correct some of the deficiencies in the earlier years of the PRR. Beginning with the requirements for the calendar 2015 safety and fire reporting, the College opted to combine their Annual Safety Report with their Annual Fire Safety Report, and titled the 2015 report as "2015 Annual Safety and Fire Report" or ASFR (which was published in September of 2016). For the remaining areas of deficiency, the Department's review process and guidance during the audit in November of 2015 has greatly assisted the College with remediating and developing what is now a well-administered program of compliance.

Two representatives from the College attended the National Association of Clery Compliance Officers and Professionals (NACCOP) conference in July 2017. The substantial Clery Act program improvements implemented at GRC earned the College the NACCOP award for the Most Improved Clery Compliance Program. We respectfully request that the Department consider this written response and the College's demonstrated dedication to campus safety when making its Final Determination on GRC's Clery Act program.

II. INSTITUTION'S RESPONSE TO REVIEW FINDINGS

As requested by the Department, GRC is providing a narrative written response to each finding and is describing the remedial actions that were taken and are being followed to address the findings and provide reasonable assurance that they will not recur. This response also summarizes the required actions for each finding, and the College is

providing copies of records or supporting information as attachments to this response to document completion of the required actions.

A. FINDING 1: LACK OF ADMINISTRATIVE CAPABILITY

The College did have a Clery Act and DFSCA compliance program during the review period, and that program was continuing to develop and improve. The Department's review found that the College did not adequately develop and implement Clery Act and DFSCA-compliant programs during the review period, and the overall compliance program evidenced a lack of supervisory oversight and training.

1. REQUIRED ACTIONS FOR FINDING 1.

The Department is requiring the College to take all necessary corrective actions to cure the violations in the PRR and adequately address the organizational weaknesses that contributed to the violations. The College must also develop and implement a system of policy and procedural improvements to ensure that these findings do not recur. As part of the process, the College is required to develop and implement a comprehensive remedial action plan.

The College must also conduct an institutional self-study during calendar years 2015-2017. The self-study must be led by an institutional official with sufficient knowledge and authority to coordinate the self-study and act as a point of contact for the review team. The self-study must include a comprehensive review of campus security policies and procedures with specific attention to: identification of reportable incidents; classification of criminal incidents; collection, compilation, and disclosure of crime statistics; identification and coordination of and communications with CSAs; coordination of and communications with the local law enforcement agencies that have concurrent jurisdiction; production and distribution of the Annual Safety Report (ASR) and Annual Fire Safety Report (AFSR); issuance of timely warnings and emergency notifications; maintenance of the daily crime log; and compliance with all aspects of the DFSCA and the Department's Part 86 regulations.

2. GRC'S RESPONSE TO FINDING 1.

Even though GRC's administration and safety department have always been focused on having a safe campus, the College concurs with Finding 1 that there was insufficient program development and supervisory oversight, and insufficient internal controls and training to ensure compliance with the Clery Act and DFSCA

during periods of time reviewed by the Department. However, GRC disagrees with Finding 1 to the extent that it suggests the College lacks a willingness to comply with federal regulations. The College did have a program including employees, (administrators and safety staff) who had program compliance responsibilities and the goal of complying with the relevant federal regulations. As described below and in other areas of this response, the College has satisfied the action items for Finding 1. Starting immediately after the audit in late 2015, the College has developed and is implementing a comprehensive remedial action plan based on the institutional Self Study (see Attachment L) to take all necessary corrective actions to cure the violations in the PRR.

- a. **Corrective and productive actions.** Immediately after the Department's on-site audit (and as directed in the Program Review Report) the College took immediate measures that included a series of productive and corrective actions to ensure the institution's overall compliance (for all campuses) with the Clery Act and associated regulations.

The College hired a former administrator to work directly under the Vice President of Student Affairs (who oversees Campus Safety among many other departments) to conduct and facilitate the coordination of the Self-Study requested in the PRR. (See Attachment L)

The College established a Clery Compliance Committee (see Attachment O) of major campus stakeholders that included more than twenty-two administrators, Vice-Presidents, directors and managers representing areas that are impacted by Clery regulations. The committee adheres to a detailed calendar (with specific actions/tasks directly related to Clery) that need to be completed throughout the year (see Attachment M).

- b. **Multiple Improvements.** Based on the Self Study which highlighted the areas needing remediation, GRC has developed and implemented multiple improvements with regards to Clery and associated regulations to ensure that the College remains in compliance. These improvements are detailed throughout this response and are discussed in specific responses to required actions specified by the Department in the PRR.

Beginning less than two months after the on-site audit (January 2016), GRC initiated a self-study of the institution's compliance with Clery and associated regulations (SaVE, VAWA, DFSCA, DAAPP, and elements of Title IX). So far, this detailed Self Study has taken nearly 20 months, and has been

comprehensive in nature involving College departments such as Outreach and Recruitment, Admissions, Human Resources & Legal Affairs, Instruction, Facilities, Residential Housing, Campus Safety, International Programs, Student Life, Athletics and Recreation, Student Government, Study Abroad, Health Services, and Counseling. A detailed timeline and calendar was created that lists actions and tasks needing to be completed each month. Part of the Clery Compliance Committee's work is to ensure that the specific actions and tasks for each area is completed on time, and to facilitate and prioritize each department's progress in completing those tasks. See Attachment M.

The Self-Study is being led by the Vice President of Student Affairs (VPSA). Beginning in 2013 when the leadership oversight of the Campus Safety and Transportation Department was transferred to the VPSA, there has been a consistent and strong push to strengthen the compliance with Clery regulations by providing effective professional development and supervision. Prior to the oversight of the VPSA, the Campus Safety & Transportation Department had the mistaken view that entering data annually into the CSSDACT was complying with Clery regulations for reporting. It was under the VPSA's initial leadership that the first Annual Safety Reports (the narrative for implementing safety policies) for the College were attempted for 2013 and 2014. Beginning in late 2014, she began to send staff to professional development opportunities through the Delores Stafford & Associates professional consulting firm specializing in campus safety training and Clery Act compliance. The position of VPSA has more than adequate authority to oversee the self-study.

The VPSA hired a very knowledgeable retired former administrator to be the point-of-contact person and to help facilitate improvements to GRC's Clery compliance. The VPSA determined that as a previous administrator, this person had the historical knowledge of the College (having been there for 26 years) and that the individual's orientation to detail and strong sense of immediacy coupled with an ability to focus on the task would prove beneficial in giving a jump-start to improving Clery compliance.

The Self-Study included a comprehensive review of campus security policies and procedures with specific attention to the required action items in Finding 1 such as: identification of reportable incidents; classification of criminal incidents; collection, compilation, and disclosure of crime statistics;

identification and coordination of and communications with CSAs; coordination of and communications with the local law enforcement agencies that have concurrent jurisdiction; production and distribution of the ASR and the ASFR; issuance of timely warnings and emergency notifications; maintenance of the daily crime log; and, compliance with all aspects of the DFSCA and the Department's Part 86 regulations. The Self-Study and review of the College's current and past practices complied with the required actions by including evaluation of the following:

- 1) An examination and analysis of College policies (including campus security policies and procedures) which revealed the need for the creation of new policies and amending current policies in order to be fully compliant with regulations.
- 2) A review of reportable incidents, including the software used, the data-points collected, the style and detail in the incident reports. This illustrated the need for a more comprehensive software platform to meet Clery regulations.
- 3) An inspection of GRC crime data for 2013, 2014, and 2015 based on the incident reporting, Clery geography, and safety patrol routes. Based on this inspection, it was determined that accurate Clery geography maps needed to be created for all campus locations to identify Incident Report locations.
- 4) Identification of CSAs and past communications and coordination of CSAs. This illuminated the need for CSA awareness and training.
- 5) An assessment of past communications or lack of communications with local law enforcement agencies that have concurrent jurisdiction with all campus locations and non-campus locations. This clarified the need for detailed written correspondence in requesting and cataloging crime data from all non-campus locations utilized by the college.
- 6) A detailed review of previous Annual Safety Reports (2013 ASFR published in 2014, and the 2014 ASFR published in 2015), including their production, content, and distribution.

- 7) A detailed review of the Annual Fire Safety Report (which was included in the above ASR). This clarified the need to change the numbers of housing residences, create new on-campus residential geography, fire safety education, along with the need for a policy for missing students, and other changes.
- 8) An examination of all college warnings (IT Alerts, Gator Alerts, Timely Warnings, Emergency Notifications, Campus Alerts), including their associated protocols and a determination of how to make changes to comply with Clery regulations of Timely Warnings and Emergency Notifications.
- 9) An analysis of the maintenance of the Daily Crime Log, including its components and associated protocols to ensure that incidents were being added within two business days of being reported to Campus Safety, that the Daily Crime Log would be consistently published without any breaks, and that all required elements were included.
- 10) An analysis of the workload capacity of the Campus Safety resulted in increasing the staffing for that department, and a new position of Assistant Director of Campus Safety was added in September 2016.
- 11) An investigation of GRCs past practices with regards to complying with regulations of the Drug Free Schools and Communities Act (DFSCA) as articulated in the Education Department General Administrative Regulations (EDGAR) Part 86 (Drug and Alcohol Prevention Programs or DAAPP)—and ways in which GRC has met the needs to meet those requirements.
- 12) As a result of all of the above activities, the College is seriously considering to hire an external evaluator to come to campus on a biennial basis who will conduct an audit of randomly selected incident reports, Clery geography maps, procedures, and policies to assess compliance. The College is determined to be fully compliant, and will make changes as appropriate based on the findings of this external evaluator.

In summary, GRC has taken significant and remedial steps to ensure that the College has adequate administrative capacity to be compliant with Clery regulations. Through the Self Study, the College gained detailed knowledge about areas needed improvement, and has continually made changes to procedures and protocols to effectively administer this department.

B. FINDING 2: FAILURE TO PRODUCE AND DISTRIBUTE ANNUAL SECURITY REPORTS IN 2008, 2009, 2010, 2011, 2012, AND 2013

The Department's review found that the College failed to produce and distribute ASRs in 2008, 2009, 2010, 2011, 2012, and 2013. The Department also noted that concerns with the 2014 ASR are detailed later in the PRR (Finding 4).

1. REQUIRED ACTIONS FOR FINDING 2.

The Department is requiring GRC to take all necessary corrective actions to address the Finding 2 deficiencies and the conditions that led up to them. The College must review and revise its current policies and procedures that govern the production and distribution of all future ASRs and develop and implement additional internal guidance as needed to provide reasonable assurance that all campus safety operations will be carried out in accordance with the Clery Act going forward with future violations. The new procedures must also specifically articulate how prospective students and employees will be notified about the report's availability.

2. GRC'S RESPONSE TO FINDING 2.

GRC concurs in part with, and disagrees in part with, Finding 2. Prior to the oversight of the VPSA of the Campus Safety and Transportation, that department was under the impression that entering the crime data annually into the CSSDACT was meeting the regulations for doing annual safety reports. However, the College concurs with the finding that it failed to produce and distribute annual security reports in 2008, 2009, 2010, 2011, 2012 and 2013.

The College has satisfied the required actions for Finding 2 as follows:

- a. **Date of Beginning to Implement Corrective Actions.** Beginning in January 2016, GRC has taken corrective action to address the deficiencies of failing to produce and distribute annual security reports, along with taking corrective action so that the deficiencies are not repeated.
- b. **Policy Review.** The College reviewed all current campus safety and college policies and procedures applicable to the governing, production, and

distribution of all future annual safety reports. A new policy (Preparation of Disclosure of Crime Statistics, including Fire Statistics for Residential Students; link: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>) was developed and adopted on August 18, 2016, that includes criteria for the production and distribution of the Annual Safety and Fire Report to match Clery requirements for notification to current and prospective students and current and prospective employees. This policy is included with this response as Attachment D.

- c. **Clery Compliance Committee.** For further internal monitoring, the College created a Clery Compliance Committee. Part of the purpose of the committee is to facilitate and ensure that priority is given to those actions and tasks to support any part of Clery regulations. To help meet overall College responsibilities, a detailed calendar of actions and tasks to meet all Clery-related timelines was implemented (Attachment M). The Clery Compliance Committee Charter is located in Attachment O.
- d. **2015 Annual Safety and Fire Report (published in 2016).** As further evidence that GRC has corrected the concerns in Finding 2, the College timely produced and distributed its 2016 ASR.
- e. **2016 Annual Safety and Fire Report (published in 2017).** As continuing evidence of GRC to correct concerns in this finding, the College again timely produced and distributed the 2016 Annual Safety and Fire Report (published in 2017) (as described in the certification notice to the Department dated Monday, October 30, 2017).

C. FINDING 3: FAILURE TO PRODUCE AND DISTRIBUTE ANNUAL FIRE SAFETY REPORTS IN 2010, 2011, 2012, AND 2013

The Department's review determined that the College failed to produce Annual Fire Safety Reports in 2010, 2011, 2012, and 2013. As a point of clarification, starting with the 2014 Annual Safety, Security and Fire Report (published in 2015), GRC opted to combine the Annual Fire Safety Report with the Annual Safety Report; the combined document is titled as the Annual Safety and Fire Report or ASFR.

1. REQUIRED ACTIONS FOR FINDING 3.

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

2. GRC'S RESPONSE TO FINDING 3.

GRC concurs with Finding 3. Fire safety is a top priority for GRC, and the College has revised its Annual Fire Safety Report to reflect all required elements of a compliant AFSR. GRC opted to merge the AFSR with the ASR to produce a singled report which was titled 2015 Annual Safety and Fire Report (published in September 2016). GRC made the following changes for the 2015 Annual Safety and Fire Report (published in September of 2016):

a. **Additional or Amended Policies.** GRC amended or added the following new policies to meet Clery requirements:

- 1). GRC developed a new policy for the preparation of Disclosure of Crime Statistics, to include Fire Statistics for Residential Students (Link: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>). The policy was created, and approved on August 18, 2016. A copy of this policy is in Attachment D. This new policy outlines the notification of the disclosure of crime and fire statistics and includes a daily fire log for the main campus, which is the only campus with residential student housing.
- 2). GRC developed a new policy for Fire Safety Education for Residential Housing at Campus Corner Apartments (CCA) (link: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-30-fire-safety-education-for-cca/>), which was approved on August 18, 2016. A copy of this policy is in Attachment F. The new policy outlines the promotion of campus fire safety education in residence housing, and requires that Campus Safety will provide educational materials about fire safety for all residents at the time of occupancy. In addition, it states that Resident Assistants and CCA employees receive orientation to the operations and locations of the fire alarm system, pull-stations, smoke alarms, and fire extinguishers during their first week of employment, and students receive a general orientation to fire systems in the building during their first week of

arrival. In addition, the policy states that CCA will hold a minimum of two fire evacuation drills during the year (one announced and one unannounced).

- b. **Proper Identification of Residence Buildings.** To assure compliance, GRC clarified with the Department about the proper identification of residence housing buildings and changed the AFSR for calendar year 2015 from a single residence (Campus Corner Apartments) to twelve different buildings identified by building name (Alder, Birch, Cedar, Dogwood, Elderberry, Fern, Grand Fir, Hemlock, Kinnickinnick, Larch, Madrona, and Townsend).
- c. **Listing of Emergency Materials for Residence Buildings.** The College also clarified and published the emergency materials for the different residence buildings in the 2015 and 2016 AFSRs. The specific emergency supplies are detailed in Appendix 2 (CCA Emergency Kit Contents) of the 2015 ASFR (published in 2016), including the kits for each Resident Assistant, and in Appendix 2 of the 2016 ASFR (published in 2017) as well.

Working through the detailed list from the Self Study, the above changes were the result of the College's consistent focus on remediating the issues and concerns brought forth in the November 2015 audit prior to the College receiving the formal PRR on September 28, 2017.

D. FINDING 4: FAILURE TO DISTRIBUTE THE 2015 ASR WITHIN REGULATORY TIMEFRAMES

The Department found that GRC distributed its 2014 ASR late on November 17, 2015, instead of the required deadline of October 1, 2015.

1. REQUIRED ACTION FOR FINDING 4.

The Department is requiring that GRC review and revise its policies and procedures to ensure that its ASRs are actively distributed to all enrolled students and current employees, each reportable year, by the October 1 deadline. GRC must also develop policies and procedures to ensure that all prospective students and employees are actively notified in a conspicuous manner about the availability of the ASR and AFSR. If the ASR and AFSR are combined; the title page must clearly state that the publication contains both the ASR and AFSR.

2. GRC'S RESPONSE TO FINDING 4

The College concurs with Finding 4 and has completed the Department's required actions to remedy the problem and prevent future violations. GRC uses several

methods, including two listservs, to send notifications to current employees and students. GRC has added procedures to ensure that all enrolled students and current employees are notified about the ASFR. The notification is sent out annually on or before the last working day in September, prior to the October 1st deadline for the publishing of the ASFR. This year, the notification was sent out on September 28, 2017. Attachment S includes copies of the emails that were sent along with a letter of certification of the publication and distribution of that ASFR. Additional notifications will be sent out on a quarterly basis on the 10th day of each succeeding quarter throughout the year. This way, all students and employees who have enrolled or hired after the initial notification, will receive the information. The notifications include the following:

- a. **Listservs for Employees and Students.** There are two listservs used, and the sender sends out the notifications to both listservs at the same time. These listservs are described below.
 - 1). *Employees 'Restricted – All College Mail'*: This first listserv is specifically a list of all employees including part-time staff (permanent, non-permanent and hourly), Adjunct Faculty, Full-time Faculty, Classified Staff and Exempt Staff. There is no “opt-out” for this list, thus these employees are guaranteed to receive notifications sent to this listserv.
 - 2). *Students 'currentstudents@mail.greenriver.edu'*: The second listserv is specifically for all students. The criteria for inclusion into this specific list is that anyone who has registration activity at all for the quarter is added to this list. In addition, a “collection-box address” was included that receives all emails sent to this specific student listserv.
- b. **Notification for Prospective Students and prospective employees.** The College also has developed standardized protocols for the notification to prospective employees. A statement is included on all job postings that meet the criteria for such notification. **“Jeanne Clery Statement: Notice of Availability of Annual Security and Fire Safety Report—** Green River College’s Annual Safety and Fire Report is available online at <https://www.greenriver.edu/media/content-assets/documents/campus/safety/grc-clery-annual-safety-and-fire-report.pdf>, containing mandated information about current campus policies concerning safety and security issues, required statistics, and other related

information for the past three calendar years. To obtain a paper copy of the report, please call 253-288-3350.

E. FINDING 5: FAILURE TO ACTIVELY NOTIFY PROSPECTIVE STUDENTS OF THE COLLEGE'S 2014 AND 2015 ASR AND AFSRs

The Department determined that GRC failed to provide active notification to prospective students about the availability of its ASRs and AFSRs for calendar year 2013 (published in 2014) and calendar year 2014 (published in 2015).

1. REQUIRED ACTIONS FOR FINDING 5.

The PRR states that GRC must develop and implement policies and procedures that specifically articulate how prospective students will be notified about the availability of future ASRs and AFSRs. GRC must provide a copy of the policies and procedures in the College's response.

2. GRC'S RESPONSE TO FINDING 5:

The College concurs with the Department that it failed to properly actively notify prospective students of the College's 2014 and 2015 ASRs and AFSRs. The College has since implemented a new policy Preparation of Disclosure of Crime Statistics, including Fire Statistics for Residential Students (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>) to ensure that such notification takes place. A copy of this policy is located in Attachment D. The new procedures include the following steps:

- a. **Email Notification.** Each year an email notification to enrolled students and college employees is sent providing the web address to the Green River Annual Safety and Fire Report. The email also includes information regarding the daily crime and fire logs, and their associated links. This email notification is to be sent out on or before October 1st each year. Thereafter, for each succeeding quarter, additional notifications are sent out on the 10th of each quarter (thereby notifying those students and employees who may have started college or employment after that October 1st. See details in Finding 4 about the make-up of the listservs used
- b. **Job Postings.** A statement regarding the Annual Safety and Fire Report is included on all job postings (for prospective employees) and on the admissions web page (for prospective students).
- c. **Informational Sticker added to brochures.** An informational sticker has been added to those Outreach and Recruitment materials which are provided to

prospective new students. The wording on the sticker is as follows: *“Jeanne Clery Statement: Notice of Availability of Annual Security and Fire Safety Report: In compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act of 1998, and as a part of the College’s commitment to safety and security on campus, Green River College reports the mandated information about current campus policies concerning safety and security issues, the required statistics, and other related informational for the past three (3) calendar years. Green River College’s Annual Safety and Fire Report is available online at www.greenriver.edu/CleryASFR. To obtain a paper copy of the report, please visit the Green River College Campus Safety Department located in the Administration Building at 12401 SE 320th Street, Auburn, WA 98092.”*

F. FINDING 6: FAILURE TO PROPERLY REQUEST CRIME STATISTICS FROM LOCAL LAW ENFORCEMENT AGENCIES

The Department found that GRC failed to properly request information regarding incidents of crimes that were reported to local law enforcement specifically, the Auburn Police Department. Regarding the 2014 ASFR, it noted that two mistakes were made in the 2014 ASR (published in 2015) because (1) the person only requested numbers of crimes without any identifying information, and (2) that he did not request dates and times of the incidences. Regarding the 2015 (published in 2016) ASFR, the campus safety official only requested that the Auburn Police Department provide the total number of crimes without any identifying information for each crime.

1. REQUIRED ACTIONS FOR FINDING 6.

The Department is requiring the following actions for Finding 6:

- a. The College must develop and implement policies and procedures that will govern the preparation of its requests for crime statistics from local law enforcement agencies, and the preparation of its audit trails which may then be used to verify the crime statistics included in its ASR and for the Department’s Annual Survey. GRC must provide a copy of the 2015 and the 2016 comprehensive audit trails in the response to this PRR
- b. The College must submit copies of its correspondence and its requests for crimes statistics from local law enforcement agencies for the 2016 calendar year, along with the responses it received.

- c. A copy of the College's 2015 and 2016 comprehensive audit trails are required in response to the PRR.

2. GRC'S RESPONSE TO FINDING 6.

The College concurs in part and disagrees in part with the Department's assertion that the College failed to properly request crime statistics from local law enforcement agencies.

- a. **Partially Concurs.** For the annual safety and fire report for 2014 (published in 2015), GRC concurs with the Department that the College did not properly request crime statistics from local law enforcement agencies.
- b. **Partially Disagrees.** For the Annual Safety and Fire Report for 2015 (published in 2016), GRC respectfully partially disagrees with the Department's assessment that crime statistics were not properly solicited.

1). The Director of Campus Safety followed the example that had been posted in the 2011 Handbook for Campus Safety and Security Reporting in Appendix B (page 252-3). In addition to requesting crime statistics from the city of Auburn, GRC requested crime data from the local law enforcement agencies of the other GRC campus locations (Kent, WA; Enumclaw, WA), and all non-campus locations for activities, workshops, and classes. This involved using an audit trail of sending letters specific to each law enforcement agency for crime data for the specific dates and times of these non-campus activities. Letters were sent to the following agencies by certified mail with return receipt requested (Algona, Auburn, Bellingham, Blaine, Camas, Covington, Des Moines, East Wenatchee, Enumclaw, Everett, Friday Harbor, Issaquah, Kent, Lacey, Liberty Lake, Longview, Mount Vernon, Port Angeles, Puyallup, Renton, Richland, Sequim, Snohomish, Snoqualmie, Spokane, Spokane Valley, Sumner, Wenatchee, and West Richland). The College collected and filed the receipts as they were returned. The error that the College did make was in not requesting crime data for on-campus and on-campus residential Clery geography for the following addresses: The GRC main campus located at 12401 SE 320th Street, Auburn, WA 98002; Campus Corner Apartments, located at 31920 124th Avenue SE, Auburn WA 98092; and Green River College Child Care Center located at 31715 124th Avenue SE, Auburn, WA 98092. The College did request data for Clery Public Geography for those same addresses. This was an inadvertent error at the time, and steps have now been put in place to not repeat this mistake again.

- 2). The College will fully comply in the future with the Department's stated criteria that it ask for identifying information for each crime committed during the specified times and days at the on-campus, on-campus residential, public property and non-campus locations. It is the intent of the College to fully meet all the Department's conditions, and hope that the information provided by the College for specific items concerning the 2015 ASFR (published in 2016) answers any questions the Department may have. (See Attachment Q: File copies and copies of the letters sent to Law Enforcement Agencies in 2016 for the calendar year 2015 along with corresponding return-receipts, including any answers received are included in this document for the Department's reference.)
- c. **Copies of Correspondence.** The College is happy to submit copies of the correspondence and requests for crimes statistics from the local law enforcement agencies for the 2016 calendar year ASFR (published in 2017).
- 1). The Department's Campus Crime Program Review Report was not received until September 28, 2017 (OPE ID: 00378000; PRCN 201610329349) after all of the correspondence and requests for 2016 crime statistics had been sent out earlier this spring of 2017. The College hopes that the Department will understand that the format used for the 2015 ASFR (published 2016) was continued into this current preparation of the 2016 ASFR (published 2017). Changes will be made to correspondence with law enforcement agencies for calendar year 2017 to comply with the Department's criteria that the College needs to request identifying information with each crime incident occurring within Clery geography.
 - 2). The College respectfully is submitting all of the letters and correspondence received for the 2016 calendar year crime statistics. Included in Attachment Q are copies of letters with their corresponding return receipts to the following local law enforcement agencies (Airway Heights, Algona, Anaheim, Auburn, Bellingham, Camas, Bothel, Covington, East Wenatchee, Enumclaw, Everett, Issaquah, Kent, King County, La Center, Lacey, Longview, Marysville, Moses Lake, Mount Vernon, Ocean Shores, Olympia, Ontario, Pasco, Pierce County, Port Angeles, Renton, Richland, San Juan County, Sequim-Clallam County, Snohomish County, Spokane, Spokane Valley, Sumner, Tumwater, Vancouver, Whatcom, and Yakima)

d. **Process to Review Incident Reports.** In reviewing all of the Incident Reports (IR) for 2015 and 2016, the College followed these steps to create audit trails:

- 1). Copied the IRs for each calendar year.
- 2). For the non-campus locations, certified letters were sent with “return receipt” requested, asking for crime data at the locations and times specified.
- 3). A comprehensive review of the IRs for Clery Crime data, Clery geography, numbers of persons, and dates of report was made by the Director of Campus Safety and the Assistant Director. A sheet with data was used to verify the information (See Attachment R).
- 4). Changes were made on the audit sheets if the attempted crime/crime on the IR was not correct (NOTE: Did not change the classification on the IR report, but did change it on the crime classification tables).
- 5). A note was put in each file/IR in which any changes were that included reasons for that change.
- 6). Tallied the Clery crimes for the calendar year on an Excel spreadsheet.
- 7). Posted the crime data on the CSSDACT.
- 8). Compared the Excel spreadsheet tallies with the tallies on the CSSDACT.
- 9). If the tallies were different, then both the spreadsheet and the charts on the CSSDACT were reviewed to locate and change and rectify those data-points/IR that were input incorrectly

In conclusion about this response, the College has shown that it has learned that meticulous detail and close attention to following consistent procedures are needed to ensure accurate crime data and statistical reporting. The College is committed to refining its practices to provide for the most accurate reporting protocols.

G. FINDING 7: FAILURE TO COMPILE AND DISCLOSE ACCURATE AND COMPLETE CRIME STATISTICS

The Department found that GRC misclassified several incidents of crime during the review period, and the Department identified 61 offenses. The Department noted that several factors contributed to the deficiencies, including some reported incidents identified as “informational” that were clearly Clery-reportable crimes, along with other errors of classification (additional burglary offenses).

1. REQUIRED ACTIONS FOR FINDING 7.

The Department is requiring the following actions for Finding 7:

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

2. GRC’S RESPONSE TO FINDING 7:

Table of Reviewed Incident Reports: The Department stated that GRC misclassified several incidents of crime during the review period, and the Department identified 61 offenses. GRC concurs in part and disagrees in part with the misclassification of the crime incidents. As a result of a comprehensive review of crime incident data in 2012, 2013, 2014 and 2015, GRC has created a Review Table of Incidents detailing with which incidents the College agrees with the misclassification and which incidents the College disagrees with the Department. This Review Table of Incidents is located in Attachment T. GRC also took the following actions to remedy Finding 7:

- a. **Training.** GRC did confirm during the audit that a lack of training was a major contributing factor to the failure to follow Clery, DFSCA, and VAWA regulations.

As a result of the audit and Self Study, the College has implemented the following actions:

- 1). All contracted Pierce County staff who work for Campus Safety have 2 hours of training in general Clery-related standards and procedures.
- 2). Since the new Campus Safety Director was hired and started on February 1, 2016, the protocol for the review of campus safety incidents involves a preliminary examination of the incident report to ensure that all necessary elements of who, what, when, where, time, and specific location have been included in the report.
- 3). In addition, the daily crime log for all campus locations has been modified to meet Clery regulations including the disposition of the incidents since March 26, 2016.
- 4). The Main Campus Incident and Fire Log is now clearly labeled as such.

b. **Protocols for Reporting Incidents.** GRC has reviewed Campus Safety's protocols for the reporting of incident reports and the classifications of Clery Act crimes. In addition, a new policy (SA-28 Preparation of Disclosure of Crime Statistics, including Fire Statistics for Residential Students was adopted on August 18, 2016. The link for this policy is: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>). A copy of the policy is in Attachment D. In addition, the copy of GRC's Training Plan and all Training Materials for the proper application of crime definitions, preparation of incident reports, review & correction of incident reports, proper maintenance of daily crime log, and basic Clery Compliance are in Attachment P, including the basic training that all contracted Pierce County Security Campus Safety Staff.

As previously stated, the College previously took remedial steps immediately after the audit and prior to receiving the Department's PRR to correct areas that needed changing to meet Clery compliance regulations. GRC is firmly committed to having correct and accurate crime and fire data readily available to students, employees, the community, and prospective students and employees.

H. FINDING 8: FAILURE TO PROPERLY DISCLOSE CRIME STATISTICS BY LOCATION

This finding concluded that GRC failed to disclose statistics for incidents of crime that occurred on the public property that is accessible from and/or adjacent to its campus for years 2008 through 2014.

1. REQUIRED ACTIONS FOR FINDING 8.

The Department is requiring the following actions for Finding 8:

- a. GRC must review all relevant property (buildings and land) to identify its Clery geography pursuant to the 4-part definition contained in the citation section of this finding.
- b. The College must provide the Department with a map accurately reflecting its Clery-reportable geography and use this updated map when conducting the audit of crime statistics required by Finding 9 of the PRR and calculating all future crime statistics for its ASRs.
- c. The College must provide the Department with a copy of the training that it provides to its safety officers regarding the crime definition and classification.
- d. The College must advise how its data crime system allows for the inclusion of public property in its daily crime log and incident reports.

2. GRC'S RESPONSE TO FINDING 8:

The College concurs with Finding 8 and has taken the following actions to correct the errors:

- a. **Determination of non-campus Clery Geography.** After the on-site audit was conducted by the Department in November, 2015, the College reviewed and identified records of all property it owned and/or controlled for all academic classes, non-academic workshops, activities, events, seminars and college-sponsored gatherings. This included space or property owned, leased, or rented that was used for any College academic or non-academic activity; if the control was time-based, the dates/times of the facility or property use was verified. This information was used in requesting crime data/statistics for the 2015 calendar year. Letters to local law enforcement agencies were tailored with the specific

location and time data in the College's request for crime data/specifics. This identification of the property included the categories listed by the department (on campus, on-campus residential, in or on a non-campus building or property, and accessible adjacent public property). In addition, clarification was made to include that public property which was not accessible or adjacent to the campus but was included on campus safety patrols.

- b. **Clery Geography Maps.** The College concurs that the map of Clery geography used in the 2013 (published in 2014) and 2014 (published in 2015) Annual Safety Reports were inaccurate. Working with the Facilities department, new and updated maps for all of the GRC campus locations (main, Auburn-downtown/Auburn Center, Enumclaw, and Kent) were created and used for the 2015 ASFR (published in 2016) and the 2016 ASFR (published in 2017). These maps were used for reviewing Crime Incident Reports (retrospectively) for the calendar year 2015 and for part of the 2016 year, and are currently being used as an information/reference resource for Campus Safety Staff for this years crime incident reports. These maps include legends which indicate specific Clery geography; using the zoom function on the pdf tool bar, Campus Safety staff can easily identify which is public, on-campus, on-campus residential, and private. These maps are located at the following links:

- 1). *Main Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/aubun-main-campus-clery-geography.pdf>
- 2). *Auburn Center:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/auburn-center-clery-geography.pdf>
- 3). *Enumclaw Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/enumclaw-campus-clery-geography.pdf>
- 4). *Kent Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/kent-campus-clery-geography.pdf>

- c. **Lack of Training about Clery Geography.** The College concurs in its response to Finding 8 that there was a lack of training it provided to its safety officers regarding crime definition and classification. In addition to the state required training that Pierce County Security now uses for those safety personnel contracted to work at GRC, the College modified the orientation/training program and added Clery specific details to the training

checklist to include Clery Geography, and non-Clery Geography. See Attachment P.

- d. **Clery Property Definitions.** The College uses the current definition of Clery Public Property (The Handbook for Campus Safety and Security Reporting 2016 Edition, pages 2-11 through 2-17). The Campus Safety Director has the current edition of the handbook, and uses it as a reference for answering questions that patrol officers and dispatcher may have. In addition, current maps with the designation of Clery Geography of all campus locations are available for reference on the GRC website at these links:

- 1). *Main Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/aubun-main-campus-clery-geography.pdf>;
- 2). *Auburn Center Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/auburn-center-clery-geography.pdf> ;
- 3). *Enumclaw Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/enumclaw-campus-clery-geography.pdf> ;
- 4). *Kent Campus:* <https://www.greenriver.edu/media/content-assets/documents/campus/safety/kent-campus-clery-geography.pdf>

- e. **Mis-identification of Incident Reports listed in Exhibit C.** The College reviewed those identified incident reports from Exhibit C (page 49 of the PRR) and has attached a table of correction. See Attachment M.

The College is committed to accurately identifying specific locations for crime and other incident reports, and to using the Clery geography maps to correctly place where incidents occurred.

I. FINDING 9: FAILURE TO MAINTAIN AN ACCURATE AND COMPLETE CRIME LOG

The Department's review found error related to maintaining an accurate and complete crime log throughout the review period. This primarily included 1) failing to incorporate all required elements in the crime log, 2) failing to update the crime log within two business days, and 3) failing to maintain the crime log for the required 60 day period.

1. REQUIRED ACTIONS FOR FINDING 9.

The Department is requiring GRC to review and revise its policies and procedures to ensure compliance with crime log requirements going forward. The revised policies and procedures must include the designation of a capable GRC official to ensure that all initial and updated crime log entries accurately reflect the facts surrounding all offenses, including the occurrence dates of the crimes, the geographic locations of the crimes, their disposition (if known) and any other pertinent information, and ensure that these entries are made within the required time timeframe as prescribed by the Clery Act.

GRC must also ensure that, at any time, 60 days worth of its daily crime log is readily accessible to the campus community and the general public for review upon request. A copy of the revised policies and procedures must be submitted with the College's response.

2. GRC'S RESPONSE TO FINDING 9:

The College concurs with Finding 9 and has complied with the Department's required actions by doing the following:

- a. **Policy for Disclosure of Crime Statistics.** The College reviewed its past practices of maintaining its crime log, and has made changes to become compliant with Clery regulations. GRC adopted a new policy on August 18, 2016, which outlines the process that is used for the crime log (See Attachment D). This is policy SA-28: Disclosure of Crime Statistics and it can be found at the following link: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>. This policy includes reporting data gathered from Campus Security Authorities. An internal Activity Log of all main campus incidents is kept, and the Incident Logs for all campuses are maintained daily (including the Main Campus Incident and Fire Log). The campus Incident Logs are updated and posted for public review within two business days of incidents being reported with the exception if the disclosure is prohibited by law or would jeopardize the confidentiality of the victim. Also, in compliance with the Clery Act, the Campus Safety Department may also withhold information from the crime log when there is clear and convincing evidence that the release of the information would jeopardize an ongoing criminal investigation or the safety of an individual, cause a suspect to flee or evade detection, or result in the destruction of evidence. This policy also mandates that the daily incident logs include the following: Report number,

date/time Reported, Type/Nature of Incident; When & Where Occurred; and Disposition of the incident.

- b. **Policy for the Daily Incident Logs.** The College's new policy also outlines the process that is used for the campus incident logs. Again, this is policy SA-28: Disclosure of Crime Statistics and it is found at the following link:
<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>

J. FINDING 10: FAILURE TO MAINTAIN AN ACCURATE AND COMPLETE FIRE LOG:

The Department's review determined that the College failed to maintain an accurate and complete fire log, including incorrectly logging a kitchen fire that occurred in December 2014.

1. REQUIRED ACTIONS FOR FINDING 10.

The Department is requiring GRC to develop and implement policies and procedures that will govern the preparation, publication, and distribution of both the Fire log and the ASFR, and will otherwise ensure that all fire safety operations at GRC are carried out in accordance with the Clery Act going forward. The new procedures must also articulate how prospective students and employees will be notified of the ASFR's availability.

2. GRC'S RESPONSE TO FINDING 10.

The College concurs with Finding 10 and has completed the Department's required actions by accomplishing the following:

- a. **Policy for the Fire Log Compliance.** As already described, the College adopted a new policy on August 18, 2016, which outlines the process that is used for the preparation, publication, and distribution of both the Fire Log and the ASFR. This policy is provided in Attachment D and is Policy SA-28: Disclosure of Crime Statistics found at the following link:
<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>. In addition, Attachment F (Policy SA-30 Fire Safety Education for Residential Housing at Campus Corner Apartments) was adopted by the College on August 18, 2016, which can be found at this link: <https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-30-fire-safety-education-for-cca/>.

b. **Policy for Notification of ASFR Availability.** Policy SA 28

(<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>) specifies that the College will distribute the notice of the availability of the ASFR through email which is sent to all enrolled students and also college employees providing the web address of the ASFR. The procedures that Campus Safety follows are:

- 1). An initial statement of notification is emailed at the beginning of the academic year (prior to October 1st).
- 2). There are follow-up emails sent out on the 10th day of the quarter for the next three terms (Winter, Spring, and Summer).
- 3). Also, on the College website for Human Resources job postings, each posted job contains the following statement: ***“Jeanne Clery Statement: Notice of Availability of Annual Security and Fire Safety Report: In compliance with Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act of 1998, and as a part of the College’s commitment to safety and security on campus, Green River College reports the mandated information about current campus policies concerning safety and security issues, the required statistics, and other related information for the past three (3) calendar years. Green River College’s Annual Safety and Fire Report is available online at: www.greenriver.edu/CleryASFR”***
- 4). For prospective students, a statement has been added to the main Outreach brochure which is: ***“Jeanne Clery Statement: Notice of Availability of Annual Security and Fire Safety Report: In compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act of 1998, and as a part of the College’s commitment to safety and security on campus, Green River College reports the mandated information about current campus policies concerning safety and security issues, the required statistics, and other related information for the past three (3) calendar years. Green River College’s Annual Safety and Fire Report is available online at: <https://www.greenriver.edu/media/content-assets/documents/campus/safety/grc-clery-annual-safety-and-fire-report.pdf> To obtain a paper copy of the report, please visit the Green River College Campus Safety Department located in the Administration Building at 12401 SE 320th Street, Auburn, WA 98092.”***

The college is committed to maintaining a complete and accurate Fire log for the main campus (which is the only campus with residential housing). Any incidents of fire at any of the buildings of the CCA housing complex are to be reported and recorded in the Main Campus Incident and Fire Log.

K. FINDING 11: OMISSIONS/INADEQUACY OF REQUIRED POLICY STATEMENTS

The Department found that GRC did not develop required statements of policy, procedure, practice and programs and include such statements in its ASRs produced in 2014 and 2015.

1. REQUIRED ACTIONS FOR FINDING 11.

The Department is requiring the College to complete the following actions:

- a. GRC is being required by the Department to develop and implement substantive policies and procedures to ensure that its ASRs are prepared, published, and distributed in accordance with the Clery Act and the Department's regulations. Using its new policies as a guide the College must submit a copy of its 2017 ASR with its response to this program review in order to allow the department to determine whether it is accurate and materially complete, meaning that the report was revised and contains all of the statistical, policy, procedure, and programmatic disclosures required by 34 C.F.R. 668.45 (b).
- b. Once the report is distributed, GRC must submit a copy of that report (ASFR) along with the evidence that clearly shows that the active distribution and active notification requirements were met. This certification must also affirm that GRC understands its Clery Act obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

2. GRC'S RESPONSE TO FINDING 11.

GRC concurs with Finding 11 and took the following actions to comply with the Department's required actions:

- a. **New College Policies:** Green River College has developed substantial new policies and procedures to ensure that the ASR/ASFR is prepared, published and distributed in accordance with the Clery Act and the Department's regulations. The College is continuing to review all policies and is in process of doing an institutional reworking of all policies, with the goal of completion by the end of 2018. That being said, the following policies have been created and/or amended to meet all Clery and associated regulatory requirements. These policies are located in Attachments A through K, and their links are below:

- 1). *Policy SA-18: Notification on Convicted Sexual Offenders and Kidnapping Offenders* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-18-notification-on-convicted-sexual-offenders/>) (Attachment A).
- 2). *Policy SA-19: Personal Violence, Harassment and Sexual Assault Policy and Procedure* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-19-personal-violence-harassment-assault/>) (Attachment B).
- 3). *Policy SA-27: Missing Student Policy* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-27-missing-student-policy/>) (Attachment C).
- 4). *Policy SA-28: Preparation of Disclosure of Crime Statistics, including Fire Statistics for Residential Students* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-28-disclosure-of-crime-statistics/>) (Attachment D).
- 5). *Policy SA-29: Facility Access and Maintenance for Safety Purposes* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-29-facility-access-maintenance-for-safety/>) (Attachment E).
- 6). *Policy SA-30: Fire Safety Education for Residential Housing at Campus Corner Apartments* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-30-fire-safety-education-for-cca/>) (Attachment F).
- 7). *Policy SA-31: Reporting Crimes and Other Emergencies* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-31-reporting-crimes-and-other-emergencies/>) (Attachment G).
- 8). *Policy SA-92: Timely Warning Policy* (<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-92-timely-warning-notifications/>) (Attachment H).

9). *Policy SA-93: Emergency Notification Policy*
(<https://www.greenriver.edu/campus/policies-and-procedures/student-affairs-policies/sa-93-emergency-notification-policy/>) (Attachment I).

10). *Policy HR-22: Nondiscrimination and Harassment*
(<https://www.greenriver.edu/campus/policies-and-procedures/human-resources-policies/hr-22-nondiscrimination-and-harassment/>) and the
Discrimination Complaint Processing Form
([https://www.greenriver.edu/media/content-assets/documents/general-information/Discrimination Complaint Processing Form-72817.pdf](https://www.greenriver.edu/media/content-assets/documents/general-information/Discrimination%20Complaint%20Processing%20Form-72817.pdf))
(Attachment J).

11). *Policy GA-1: Drug Free Campus Policy*
(<https://www.greenriver.edu/campus/policies-and-procedures/general-administrative-policies/ga-1-drug-free-campus-policy/>) (Attachment K).

b. Distribution of the GRC 2016 ASFR (published in 2017) on or before October, 1, 2017. The College actively distributed the 2017 Annual Safety and Fire Report (for calendar year 2016) to all current employees and enrolled students on September 28, 2017. The ASFR can be found at this link (<https://www.greenriver.edu/media/content-assets/documents/campus/safety/grc-clery-annual-safety-and-fire-report.pdf>) and is also provided in Attachment U. This initial distribution took place in the form of a notification email on September 28, 2017, to the following listservs of (1) *Restricted – All College Mail, and (2) currentstudents@mail.greenriver.edu .

1). *Criteria for inclusion in the *Restricted – All College Mail:* is that the person is one of the following: a current full time permanent employee, a current permanent employee less than full time, and part-time employees who have been hired by various departments to work usually less than 16 hours/week. Employees cannot “opt-out” of this list-serv.

2). *Criteria for inclusion in the currentstudents@mail.greenriver.edu:* is that any student who has registration activity at all for the quarter is added to this list-serv. In addition, a “collection box address” was included that receives all emails sent to this specific student list-serv.

Copies of the emails notifying both employees and students of the 2017 ASFR are contained in Attachment S of this response, and the dates/times for each email

are listed below. Email #2 was a follow-up to the original email, and with an additional notation that a paper copy was available upon request. Email #3 was a follow-up to email #2, noting that the link in the previous email was inoperable, and provided a working link. Attachment W contains the contents of the student distribution inbox showing that these emails below were sent and received (and is the same material that was documented in the Certification statement sent to the Department on October 30 in response to the required action in Finding 12.

Email #1: Sent on Friday, September 29, 2017 at 4:09 PM to *Restricted – All College Mail; currentstudents@mail.greenriver.edu

Email 2: Sent on Friday, October 13, 2017 at 11:38 AM, amended with the additional statement that a paper copy would be available upon request.

Email 3: Sent on Friday, October 13, at 11:52 AM because of feedback received by Campus Safety which noted that the link to the ASFR did not work. (Note: The College changed web platforms of Monday, October 9, 2017) This email was sent out and included a link that worked.

The College realizes that it should have provided the information about requesting a paper copy with the initial email, corrected the issue, and will continue to provide the information in the future. Also note that this message as corrected will be sent out (after the initial “blast” for the Fall Quarter notification) during all succeeding quarters on the 10th academic day of those quarters. It is on the 10th day that all class rosters have completed adding students, and thus, all students (and any new employees added since October 1, 2017) for those upcoming quarters (Winter, Spring, and Summer) will get this same notification. It is the commitment of the College to fully comply with the Clery Act regulations.

L. FINDING 12: DISCREPANCIES BETWEEN CRIMES STATISTICS INCLUDED IN THE ASR AND CRIME DATA REPORTED TO THE CSSDACT.

The Department determined that GRC’s 2015 ASR (2014 ASR published in 2015) failed to report accurate crime statistics and contained other errors.

1. REQUIRED ACTIONS FOR FINDING 12.

The Department listed the following required actions for the College to remedy Finding 12:

- a. GRC must develop and implement policies and procedures to ensure that its crime statistics are prepared, published and distributed in accordance with the Clery Act.
- b. Using its new policies as a guide, the College must revise its 2014 ASR and CSSDACT-Reported crime statistics to ensure that they are accurate and materially completed in accord with 34 CFR 668.46(b).
- c. If, in the course of its review of the 2014 crime statistics, the College identifies any additional deficiencies, it must advise the Department of these deficiencies in its response. Furthermore, GRC must submit a copy of its 2017 ASR with the Category of Arson included in its crime statistics.
- d. GRC will be required to actively distribute the 2017 ASR to all enrolled students and current employees in accordance with 34 CFR 668.41(e). Once the new ASR is distributed, the College will be required to provide documentation to the Department, no later than October 31, 2017, evidencing that this distribution took place on or before October 1, 2017, also with a certification statement attesting to the fact that the materials were distributed in accordance with the Clery Act. This certification must also affirm that GRC understands its Clery Act obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur.

2. GRC'S RESPONSE TO FINDING 12:

GRC concurs with Finding 12 and took the following required actions to correct the deficiencies noted by the Department.

- a. Preparation of Policies and Procedures for Crime Statistics. See Attachments A through K discussed in Finding 11 above which identifies and provides links to the eleven (11) new or recently amended College policies with regard to Clery regulations. Note that Policy SA-28 specifically deals with the preparation of crime statistics.
- b. Table denotes review of Incident Reports. The Campus Safety Director reviewed incident reports for calendar year 2014. Based on this review, new Crime Data Charts are presented (Attachment V) for calendar year 2014.

- c. 2016 ASFR (Published in 2017) with Category of Arson included. In reviewing the 2014 crime data, the College reviewed those incidents in calendar year 2014, and prepared a new table for that data. As well, a copy of the 2016 ASFR (published in 2017) is included in Attachment U. In addition, note that the category of Arson is included in its crime statistics on pages 55 (Table 10), page 57 (Table 11), page 58 (Table 12), page 59 (Table 13).
- d. 2016 ASFR Distribution and Certification to Department. GRC actively distributed the 2016 ASFR (published in 2017) to all enrolled students and current employees on Friday, September 28, 2017, via email to two listservs (as detailed in the GRC response to Finding 4 and Finding 11). A copy of the certification statement is included in Attachment W. The certification affirms that GRC understands its Clery Act obligations.

The College fully understands that accuracy is required in the identification, compilation, and verification of crime data in their ASFR as reported to the CSSDACT. Audit procedures/trail has been adopted (see GRC response to Finding 6) to ensure that similar mistakes will not reoccur.

M. FINDING 13: FAILURE TO COMPLY WITH DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS:

The Department determined that GRC failed to comply with the Drug and Alcohol Program requirements.

1. REQUIRED ACTIONS FOR FINDING 13.

The Department is requiring the College to take the following corrective actions for Finding 13:

- a. Develop, update, and publish a single, materially-complete document, detailing the drug and alcohol prevention program(s) containing all the elements required in a fully comprehensive DAAPP 34 CFR §86.100(a).
- b. Develop and implement procedures for ensuring that the required DFSCA materials are distributed to every current student who is enrolled for academic credit as well as to every current employee of GRC. GRC must make provisions for providing copies of the DAAPP to students who enroll after the initial distribution 34 CFR §86.100(a). GRC must make provisions for copies of the

DAAPP to employees who are hired at different times throughout the year. 34 CFR §86.100(a).

- c. Provide documentation evidencing the distribution, as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the DFSCA. The documentation should contain proof that the materials were distributed and a narrative as to how the College believes it has met the applicable statutory and regulatory requirements. 34 CFR §§86.3 & 86.4.
- d. Conduct a biennial review to measure the effectiveness of its DAAPP. GRC must describe the research methods and data analysis tools used to determine program effectiveness, and identify the officials and offices responsible for assessing data collected for evaluation. The biennial review report must be approved by GRC's president and its board.
- e. Submit a statement certifying that the institution understands its DFSCA obligations, and that it has taken all necessary corrective actions to ensure that these violations do not occur.
- f. A copy of the revised policies and procedures must be submitted with the College's response to the PRR. The College must also provide a response addressing the issues in this finding and those issues associated with the identified incidents, and include it in its response.

2. GRC'S RESPONSE TO FINDING 13.

Green River acknowledges that the College has not had a cohesive and fully comprehensive Drug And Alcohol Prevention Program (DAAPP). Whereas the College employed some interventions and resources for employees and students, the College admits that the program was not complete. Working on that premise, the College has made the following progress on the development and plans for meeting the Required Actions to Finding 13.

- a. **Single Document that details the DAAPP program and contains all of the elements in 34 C.F.R. §86.100.** The College received the PRR on September 28, 2017, and has been working on accomplishing the Department's required actions. A draft outline for a new program development for a single comprehensive DAAPP has been created to have a two-pronged approach; one for employee needs and the other for student needs. (See Attachment X). In addition any proposed program that would involve employees needs to be

reviewed and approved by the specific unions (The Green River United Faculty Coalition for faculty, and the Washington Federation of State Employees (WFSE) for classified employees) prior to being submitted to the Board of Trustees (BOT). The proposed program as outlined sets a tentative submission to the BOT in March, 2018. Between November 2017 and March of 2018, this proposal will go through the preapproval process from both faculty and staff unions prior to it being submitted to the BOT for their authorization to proceed. Please note that this proposed program has both a mission and vision statement that supports healthy decision-making by employees and students around drug and alcohol issues.

- b. **Distribution Procedures.** Develop and implement procedures for ensuring that required DFSCA materials are distributed to current students and employees. The College has in place the following procedures for distribution of the DFSCA materials to students and employees.
- 1) The College will send an email to all employees annually each December containing a link to the Annual Notification including
 - i. Standards of conduct
 - ii. Possible legal sanctions and penalties
 - iii. Statements of the health risks associated with AOD abuse
 - iv. The college's alcohol or drug programs and/or referrals for assistance available to students and employees;
 - v. Disciplinary sanctions for violations of the standards of conduct.
 - 2) All registered students will be sent an email with a link to the Annual Notification including the same information as listed above for employees, on the 10th day of each quarter (fall, winter, spring and summer) which is the official day of student/class roster certification.
- c. **Documentation and Certification.** Provide documentation evidencing the distribution and a certification statement attesting to the fact that materials were distributed appropriately, along with a narrative as to how the College has met applicable statutory and regulatory requirements. The College has been notifying both students and employees of the DFSCA materials and information. Copies of emails showing this notification along with attached materials are included in Attachment Y.

- d. **Biennial Review.** Conduct a biennial review to measure the effectiveness of the DAAPP. The College previously conducted a biennial review in November 2015 that was provided to the audit team that same month. The new proposed DAAPP has a tentative schedule for the two next years. See Attachment X for details.

- e. **Certification of Understanding.** Submission of a statement certifying that the institution understands its DFSCA obligations, and that it has taken all necessary corrective actions to ensure that these violations to not recur. See Attachment Y for the Statement of Certification for Finding 13.

This response has provided a narrative reply and support facts and documentation for each of the Department's thirteen findings. Page 32 of the PRR does state that a copy of the revised policies and procedures must be submitted with the College's response to the PRR. As stated in the individual responses to the findings and in the table of attachments, copies of revised policies and procedures are being provided to the Department. Page 32 of the PRR also requires a response from the College addressing the issues in this finding and those issues associated with the identified incidents to be included in the College's response. This response from the College has addressed all of the issues in the PRR.

The Department's PRR also includes some detailed recommendations at the end of the report. The College greatly appreciates the recommendations and is carefully evaluating each component to further improve our compliance program.

III. CONCLUSION

The College's administration acknowledges the importance of Clery compliance reporting. The current administration is highly committed to being in full compliance with every aspect of the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistic Act and the Drug-Free Schools and Communities Act (DFSCA).

The review period for the audit was from 2008-2013, which was during a time of two administrative presidential transitions, one executive staff transition, and three directors of campus safety changes. Under the new president and administration oversight significant improvements including administrative capacity, distribution of annual safety and fire safety reports, timely notice to perspective students, clear campus geography, policy creation and updates, as well as technology and crime statistic tracking has been a top priority.

The compliance priorities from the exit meeting with the auditors in November 2015 as well as the focus on compliance shortly after the audit, led Green River administration and Campus Safety to work diligently to be in compliance. After the exit meeting in November of 2015, and in anticipation of the program review report, administration administered a self-assessment to evaluate potential compliance issues and anticipate the preliminary program review findings. Significant progress was accomplished over the two year period. This intentional assessment and successful implementation of improvements helped Green River College to receive the National Association for Clery Compliance Officers and Professionals (NACCOP) award for the Most Improved Clery Compliance Program for 2017.

The Department of Education has been extremely helpful throughout this process with the shared goal of being Clery compliant. Green River College is thankful for the opportunity to respond to the findings of this program review report.

If you have any questions concerning this response, please contact Derek Ronnfeldt at (253) 288-3335 or via email at dronnfeldt@greenriver.edu.

IV. TABLE OF ATTACHMENTS (IN SEPARATE PACKET)

Attachment A:	Policy SA-18: Notification on Convicted Sexual Offenders and Kidnapping Offenders
Attachment B:	Policy SA-19: Personal Violence, Harassment and Sexual Assault Policy and Procedure
Attachment C:	Policy SA-27: Missing Student Policy
Attachment D:	Policy SA-28: Preparation of Disclosure of Crime Statistics, including Fire Statistics for Residential Students
Attachment E:	Policy SA-29: Facility Access and Maintenance for Safety Purposes
Attachment F:	Policy SA-30: Fire Safety Education for Residential Housing at Campus Corner Apartments
Attachment G:	Policy SA-31: Reporting Crimes and Other Emergencies
Attachment H:	Policy SA-92: Timely Warning Policy
Attachment I:	Policy SA-93: Emergency Notification Policy
Attachment J:	Policy HR-22: Nondiscrimination and Harassment and the Discrimination Complaint Processing Form
Attachment K:	Policy GA-1: Drug Free Campus Policy
Attachment L:	Remedial Plan based on Self Study
Attachment M:	Clery Task Completion including identified Departments
Attachment N:	Table in response to Finding 8
Attachment O:	Clery Act Compliance Committee
Attachment P:	GRC's Training Plan and all Training Materials for the proper application of crime definitions, preparation of incident reports, review & correction of incident reports, proper maintenance of daily crime log, and basic Clery Compliance [Finding 7]

- Attachment Q: File copies and copies of the letters sent to Law Enforcement Agencies in 2016 for the calendar year 2015 along with corresponding return-receipts, including any answers received are included in this document for the Department's reference. As well File copies and copies of the letters sent to Law Enforcement Agencies in 2017 for the calendar year 2016 along with corresponding return-receipts, including any answers received are included in this document for the Department's reference
- Attachment R: (A comprehensive review of the IRs for Clery Crime data, Clery geography, numbers of persons, and dates of report was made by the Director of Campus Safety and the Assistant Director. A sheet with data was used to audit the information) (See Finding 6)
- Attachment T: Review Table of Incidents
- Attachment U: 2016 Annual Safety and Fire Report (published in 2017)
- Attachment V: Crime Data Charts for calendar year 2014
- Attachment W: Certification Statement to Department for Finding 12
- Attachment Y: Verification (emails and documents) for DFSCA Notification, including Certification for compliance for DFSCA
- Attachment X: Proposal for revising the current DAAPP
- Attachment Y: Statement of Certification for Finding 13 and supporting documents showing distribution of materials for 2016 and 2017.