

# Issues in Illinois college campus safety

History and development of campus safety planning





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## **Foreword**

The Illinois Criminal Justice Information Authority (ICJIA) is a state agency created in 1983 to promote community safety by providing public policymakers, criminal justice professionals, and others with information, tools, and technology needed to make effective decisions that improve the quality of criminal justice in Illinois. ICJIA provides an objective system-wide forum for identifying critical problems in criminal justice, developing coordinated and cost-effective strategies, and implementing and evaluating solutions to those problems. The specific powers and duties of the agency are delineated in the Illinois Criminal Justice Information Act (20 *ILCS* 3930). ICJIA's many responsibilities include serving as a clearinghouse of information and research on criminal justice and undertaking research studies to improve the administration of criminal justice.

Since 1989, ICJIA's Research and Analysis Unit has received funds under the federal Anti-Drug Abuse Act of 1988 and the succeeding Justice Assistance Grant program to document the extent and nature of drug and violent crime in Illinois and the criminal justice system's response to these offenses. ICJIA has since amassed a large amount of data measuring the extent and nature of drug and violent crime in Illinois and the impact these crimes have had on the criminal justice system. In the wake of several violent tragedies at colleges in the United States, ICJIA's Research and Analysis Unit compiled this report to provide an overview of the history, development, and implications of Illinois campus safety planning mandated through the *Jeanne Clery Disclosure of Campus Security Policy* and the *Illinois Campus Crime Statistics Act of* 2008. While the information presented in this report is by no means inclusive of all issues related to campus crime, it does provide a general historical overview of crime on campuses and effective safety measures relevant to Illinois college campuses.

This report as the first in a series of ICJIA reports on college crime and safety issues. Subsequent reports will describe the data about offenses committed on and around college campuses in Illinois. Topics will include trend analyses of reported criminal offenses at 2 and 4- year colleges in Illinois, a comparison of arrests and referrals for disciplinary action on campuses, reported crime in residence halls, the prevalence of reported sexual assault on campuses, and the prevalence of reported hate crimes on college campuses in Illinois.

## History and development of college campus safety planning

## Introduction

Incidents of extreme violence on and around college campuses, such as the shootings at Virginia Tech and Northern Illinois University, are rare. However, such events can have devastating and long-lasting consequences for students, faculty, and family members. While violent acts on campuses typically receive extensive media coverage, alcohol and drug violations, rather than violent crime, are the most prevalent types of offenses on college campuses. Nonetheless, college administrators and campus law enforcement must take threats of extreme violence seriously and do everything they can to improve the safety and security of students, faculty, and staff on campuses.

The purpose of this report is to identify the incidents that inspired federal and state legislative changes regarding campus safety, to trace the history this legislation, and to identify steps taken to ensure that institutions of higher education are safe learning environments for faculty, staff, students, and visitors.

## History of violent campus crimes

Violence on college campuses is not commonplace, but examples of extreme violence stand out through history and have shaped policy. Dating back to riots at Oxford University in the 13<sup>th</sup> century that left 60 students and 30 townspeople dead, many violent student deaths on and near college campuses have been recorded around the world. These range from armed clashes at college campuses in Bangladesh on the Dhaka University campus in 2001 to the recent horrific events on university campuses across the United States.

In the United States, several high profile incidents of violence led to changes in campus culture and state and federal legislation regarding safety policies and procedures. In the 1960s and 1970s, a string of violent incidents made headlines. In 1966, Richard Speck murdered eight student nurses in their Chicago residence. Also in 1966, college student Charles Joseph Whitman killed 17 people and wounded 31 during a siege at the University of Texas. In 1970, at Kent State University, an anti-war rally turned deadly with National Guardsmen opening fire, killing four students and wounding nine. In 1978 at Florida State University, Ted Bundy beat and raped four Chi Omega sorority members, strangling two to death. At Alfred University in New York later that year, Chuck Stenzel died from alcohol poisoning in a hazing event which led to the creation of a national anti-hazing organization.

In 1986 at Lehigh University in Bethlehem, PA, student Jeanne Clery was beaten, raped, and murdered in her dorm room by a student unknown to her. This incident and subsequent discussions led to the creation of the federal Crime Awareness and Campus Security Act of 1990, which went through many name iterations until finally being dedicated to Jeanne Clery and subsequently renamed the Clery Act in 1998.<sup>9</sup>

In 1990, the person who would become known as the Gemini Killer wreaked havoc on the town of Gainesville, Fla., raping, mutilating, and killing eight students from the University of Florida and Santa Fe Community College. A year later, police arrested Danny Rolling, who blamed the serial killings on his alter ego, "Gemini." <sup>10</sup>

In the 1990s, news outlets brought to public attention the issues of date rape, hazing, and binge drinking. On June 3<sup>rd</sup> 1991, *Time Magazine* ran the headline "Date Rape." The issue focused on Kate Doestner, who spoke out about being sexually assaulted by a fellow student while attending the College of William and Mary. <sup>11</sup> Also in 1991, a graduate student Gang Lu, opened fire in two buildings on the University of Iowa campus killing 5 people, wounding 2, and eventually killing himself. <sup>12</sup>

In 1996, a graduate student at San Diego State pulled out a gun and killed three professors while defending his thesis before the faculty committee. <sup>13</sup> In 1997, attention was once again drawn to hazing and binge drinking when a new freshman, Scott Krueger, died of alcohol poisoning during a fraternity hazing event at MIT. <sup>14</sup>

In October 1998, Matthew Shepard, an openly gay student at the University of Wyoming, was robbed and brutally beaten by two men and eventually died five days after being rescued. <sup>15</sup> This event brought attention to hate crimes based on sexual orientation to the media forefront in the late 1990s. Matthew Shepard became a symbol for gay rights and tolerance. <sup>16</sup>

In 1999, the "Right to Party" riots occurred at Michigan State University. As colleges began to crack down on underage drinking and public drunkenness, students began to revolt in violent ways. After college administrators in East Lansing, Mich., banned alcohol at a popular tailgating site, 10,000 students and townspeople torched cars, hurled bottles at police, set more than 60 fires and caused about \$1 million worth of damage to the campus and town. <sup>17</sup>

In 2000, Dr. Jian Chen, a medical resident at the University of Washington in Seattle killed his supervisor and himself. Also in 2000, James Easton Kelly, a graduate student at the University of Arkansas killed himself and his English professor after being dropped from the doctoral program. <sup>18</sup> In 2002, a nursing student at the Arizona Nursing College brought several guns to campus and shot and killed three instructors and then himself. <sup>19</sup>

Tragedies such as the shootings at Virginia Tech in 2007 and Northern Illinois University in 2008 again brought a heightened awareness to violent crimes on campus. In 2007, 33 people were shot and killed at Virginia Tech by senior Seung-Hui Cho, who later killed himself.<sup>20</sup> The massacre at Virginia Tech was the deadliest incident on a college campus in U.S. history.<sup>21</sup>

In 2008, former graduate student Steven Kazmierczak, opened fire in a lecture hall at Northern Illinois University, killing five people and injuring 16 more before turning the gun on himself. <sup>22</sup> Even smaller universities in Illinois are not immune to the stress of possible violence on campus. In 2008, the campus of Saint Xavier University on Chicago's southwest side shut down for several days after a violent threat had been scrawled on a residence hall wall. <sup>23</sup> A student of the university was arrested two weeks later for the offense and was sentenced to two years probation,

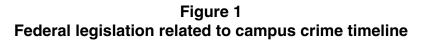
## History and development of college campus safety planning

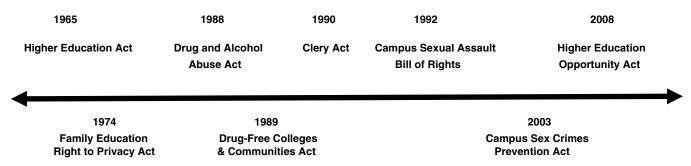
community service, and counseling. Concurrently, Malcolm X College was closed due to a copycat crime. <sup>24</sup>

These incidents have been the catalyst for federal<sup>25</sup> and state laws aimed at improving safety on college campuses while protecting the privacy and liberty of individuals and helping people with mental illnesses get needed services.<sup>26</sup> This report provides an overview of campus crime and the measures taken to ensure the safety and well-being of students, faculty, staff, and visitors. As a representative from the National Association of Student Personnel Administrators stated in the early 1990s, "A safe campus environment is one in which students, faculty, and staff are free to conduct their daily affairs, both inside and outside the classroom, without fear of physical, emotional, or psychological harm. Personal safety is a basic human need that must be preserved if the mission of the university is to be pursued."<sup>27</sup>

## Federal response to campus crime

This section summarizes the most prominent federal laws protecting college and university communities, including the Drug and Alcohol Abuse Prevention Act of 1988, the Drug-Free Colleges and Communities Act of 1989, the Student Right to Know Act of 1990, the Jeanne Clery Disclosure of Campus Security Act of 1990, and Campus Sex Crimes Statistics Act of 1990. These federal laws aim to protect students from and warn them of crime and danger, both on campus property and in off-campus housing recommended by the college (Figure 1).





## Federal laws regarding campus security and crime information dissemination

#### Drug-Free Colleges and Communities Act and the Drug and Alcohol Abuse prevention regulations

The Drug and Alcohol Abuse Prevention Act of 1988 regulations (34 CFR Part 84) and the Drug-Free Colleges and Communities Act of 1989 (34 CFR Part 86) both enacted in 1990, are intended to educate students about the dangers of illicit drugs as well as to prevent students from engaging in illicit drug and alcohol-related activities on college premises. The Acts' regulations require that as a condition of receiving financial assistance from the federal government, an institution of higher education must provide certification that it has implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. The regulations of these acts require that institutions distribute the following information to students and staff each year:

- Standards of conduct prohibiting the unlawful possession, use, or distribution of illicit drugs and alcohol on college property or college events.
- Description of applicable federal, state, and local sanctions for the unlawful possession or distribution of illicit drugs or alcohol.
- Explanation of health risks associated with illicit drug use and alcohol abuse.
- Description of drug and alcohol treatment available to staff and students.
- Statement that the institution will discipline students and staff for any violations of the standards of conduct.

In response to the Drug and Alcohol Abuse Act of 1988 prevention regulations and the Drug-Free Colleges and Communities Act of 1989, schools are using a combination of approaches utilizing education, prevention counseling, and treatment programs. For example, schools are offering extended hours for the library and recreational facilities (not sure how this prevents violence), as well as providing a greater variety of campus sponsored alcohol-free activities.<sup>30</sup>

### The Crime Awareness and Campus Security Act of 1990 (Clery Act)

The Jeanne Clery Disclosure of Campus Security Policy and Campus Sex Crime Statistics Act of 1990 (originally the Crime Awareness and Campus Security Act of 1990) now commonly referred to as the Clery Act, is a federal law that requires institutions of higher education in the United States to disclose campus security information including crime statistics for the campus and surrounding areas. It was first enacted by Congress in 1990 and amended in 1992, 1998, 2000 and 2008. According to the Clery Act, the following categories of crime statistics for campus, certain non-campus properties, and certain public property areas which have been reported to local police and campus security authorities must be disclosed for the most recent three calendar years:

- Homicide
- Murder & non-negligent manslaughter
- Negligent manslaughter
- Forcible sex offenses
- Non-Forcible sex offenses
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson

The Clery Act also requires that schools provide statistics for the following categories of arrests or referrals for campus disciplinary action (if an arrest was not made).

- Liquor law violations
- Drug law violations
- Illegal weapons possession<sup>31</sup>

As early as 1980, the FBI Uniform Crime Report for colleges expressed alarm at the rapid growth of campus violence related to alcohol and drug abuse. But it was another incident involving a college student that led to changes in collecting and reporting crime on college campuses in the United States. In 1986, after college student Jeanne Clery was murdered in her dorm room by a student she did not know, her parents became aware that college administrators had not warned students about other crimes that had previously occurred on campus. The Clerys were concerned that although most colleges had some type of security or police force on campus, only 4 percent of higher education institutions were publicly reporting campus. With input from the public, Congress enacted the Student-Right-to-Know and Campus Security Act (Public Law 101-542) in 1990, as an amendment to the Higher Education Act of 1965. This Act requires

colleges participating in federal financial aid programs to provide students with information regarding graduation rates, student loan default rates, and campus security information.<sup>32</sup>

Through the advocacy of the Clerys for more transparency on campus safety issues, Title II of the Crime Awareness and Campus Security Act of 1990, required public dissemination of campus security policies and campus crime statistics on a yearly basis to all students and employees, and to applicants upon request. The law went into effect in 1991 and charged the U.S. Department of Education with enforcement. Substantial misrepresentation of the reported numbers, locations, or nature of crimes could result in a fine of up to \$27,500 for each violation or suspension from student aid programs. <sup>33</sup>

In 1992, the Campus Sexual Assault Victims' Bill of Rights, a part of the Higher Education Amendments of 1992 (Public Law: 102-325, section 486(c)) was amended to afford certain rights to students who are victims of sexual assault, particularly student-on-student and date rape situations.<sup>34</sup> This amendment provided sexual assault victims the right to contact off-campus authorities to investigate campus sexual crimes, mandated colleges to conduct education programs for students to promote awareness of rape, acquaintance rape, and other sex offenses, and notify all students of available counseling for sexual crimes.<sup>35</sup>

New requirements reporting were added through amendments made in 1998 to the Higher Education Act of 1965, including the reporting of hate crimes, including geographic breakdowns of crime locations on and near campuses, and requiring campus security to keep mandatory public crime logs. At this time, the Campus Awareness and Campus Security Act of 1990 was renamed The Jeanne Clery Disclosure of Campus Security Policy and Campus Sex Crime Statistics Act of 1990 and is now referred to as the Clery Act.

#### Campus Sex Crimes Prevention Act of 1990

In 2000, the Campus Sex Crimes Prevention Act (Section 1601 of PA 106-386), which amended the Jacob Wetterling Crimes against Children and Sexually Violent Offender Registration Act, was enacted to provide a tracking system for registered sex offenders enrolled as students at colleges, or working or volunteering on campus. Sex offenders who are already required to register in a state must also provide notice to colleges of their presence as a student or employee. This act requires that this registration information be made available to the local law enforcement agencies serving the colleges. These requirements are tied to state eligibility for certain types of federal grant funding and must be implemented through state law. The Act also amended the Clery Act regarding information that colleges must make available regarding registered sex offenders on campus. Finally, the Act also amended the Family Educational Right to Privacy Act of 1974 (20 USC S. 1232g) to ensure victims of campus violence easier access to the previous criminal records of student perpetrators. <sup>36</sup>

In 2003, the Clery Act was amended again with the passage of the Campus Sex Crimes Prevention Act, requiring colleges to notify students where public "Megan's Law<sup>37</sup>" information about registered sex offenders on campus could be obtained.

The law was amended again in 2008. As adopted in the Higher Education Opportunity Act of 2008 (Public Law 110-315), reported hate crime categories were expanded. In addition, colleges

were required to provide information regarding the working relationships between campus security personnel and state and federal law enforcement agencies. Focus also was added on emergency preparedness, as colleges were required to include a statement of current campus policies regarding immediate emergency response and evacuation procedures for all types of significantly dangerous situations, both natural and man-made.

## Implications of the Clery Act as of 2010

The Clery Act has been most impactful in the development and dissemination of campus security regulation information. The central components of Clery Act compliance include:

- Development, disclosure, and implementation of all campus security policies.
   This includes:
  - 1) Policies regarding procedures for students and others to report crimes or other emergencies occurring on campus in an accurate and prompt manner, and the college's response to such reports.
  - 2) Policies regarding security and access to campus facilities, including residences/
  - 3) Policies concerning the law enforcement authority of campus security personnel.
  - 4) Policies concerning working relationships with other local state and federal law enforcement agencies for investigating alleged criminal offenses in campus/
  - 5) Development of educational programs to inform students and employees about these campus security policies, as well as crime prevention strategies.
  - 6) Policies concerning monitoring (through local law enforcement) any criminal activity at off-campus student organizations, such as fraternities and sororities.
  - 7) Policies regarding the possession, use, or sale of alcohol and illegal drugs and the enforcement of the underage drinking laws and the enforcement of federal and state drug laws.
  - 8) Policies concerning how the campus community may obtain information on registered sex offenders.
  - 9) Policies regarding sex offense prevention programs offered to students, procedures to be followed once a sex offense has occurred, including the option to notify local law enforcement authorities.

The 2008 amendment to the Clery Act also expanded campus security policies to include immediate emergency response and evacuation procedures, publicizing and testing these emergency procedures on an annual basis.

- A daily public crime log. Institutions with police or security departments are required to keep daily crime logs. Institutions that do not have police or security departments are not required to maintain a daily crime log but are required to comply with all other provisions of the Clery Act. The log is to be kept by campus law enforcement and disclose "any crime that occurred on campus...or within the patrol jurisdiction of the campus police or the campus security department that is reported to the campus police or security department." This log is not limited to crime categories reported as required to the U.S. Department of Education. The log must include the nature, date, time, and general location of each crime, as well as the outcome, if available. The log must be publicly available during business hours and be accessible to students, staff, and the general public. Reported crimes must be added to the log within two business days. However, certain limited information may be withheld to protect victim confidentiality, ensure the integrity of ongoing investigations, or to keep a suspect from fleeing.
- **Timely warnings**. Colleges must provide timely warnings to the campus community about any event on or around the campus that may pose a threat to the safety of staff and students, as determined by college officials and campus security. Policies must be developed to determine:
  - Circumstances that would trigger a warning, including Clery Act-defined crimes and any other dangerous situations reported to campus law enforcement considered to represent a serious or continuing threat to students and employees.
  - 2) The method for collecting information such as police/security, access monitors, officials responsible for campus and student activities.
  - 3) The person responsible for issuing the warning.
  - 4) The manner of warning dissemination, which must be quick and community-wide via e-mail/text messaging, posters, news releases, or other means.
- An annual campus security report. This report must contain statements on campus security policies required under the Clery Act as well as campus crime statistics for the previous three years. This report is to be published and distributed to current and prospective students and employees by October 1<sup>st</sup> of each year. There is no grace period, although online dissemination is allowed, with paper copies to be made available upon request.

• Crime statistics for the most recent year and two preceding calendar years reported to the U.S. Department of Education. The crime categories to be reported are defined by the Clery Act (most recently amended in 2008). These include crimes committed on campus, in institutional facilities, in university-controlled non-campus buildings, and on public property.<sup>38</sup>

The amendments made to the Clery Act in 2008 require the U.S. Department of Education to report to Congress annually on Clery Act compliance and implementation of the law. It also authorizes the U.S. Department of Education to seek the counsel of the attorney general concerning the development and dissemination of best practices on campus safety and emergencies. Finally, provisions were added to protect "whistleblowers" by prohibiting any retaliatory action against individuals who file, assist, or are otherwise involved in a Clery Act complaint or investigation.

## U.S. Department of Education (Clery Act) data availability

Before 1992, the only campus crime data available was through the Illinois State Police's Uniform Crime Reporting program. Colleges with established law enforcement agencies with sworn officers reported crimes. As a result, it could not be generalized to campuses across Illinois. Beginning in 1992 college administrators began to submit crime data to the U.S. Department of Education's Office of Post Secondary Education in order to comply with the Clery Act. These data were made public beginning in 2001.<sup>39</sup>

Through the U.S. Department of Education website, data can be accessed and downloaded by school, type of crime, location, and calendar year. Public users can access data for one college at a time, a report of the school's last three years of crime data along with general information about the college. Users can also access aggregated data for a group of colleges and obtain a report that provides the total number of selected crime data over the three prior years.

A comprehensive analysis of Clery Act data will be conducted by the Authority using datasets created from downloaded data for all Title IV Illinois colleges. <sup>40</sup> The findings are presented in subsequent reports to be published on the Authority's website: <a href="www.icjia.state.il.us">www.icjia.state.il.us</a>. The reports will describe different aspects of crime trends for all colleges with enrollments of 2,500 students or greater. Separate analysis will be conducted on all two-year, four-year, public and private colleges across the state. Data will be presented by:

- Offense type (violent, property).
- Violation type (liquor, drug, or weapon).
- Outcome type (arrests, and referrals for school disciplinary action reported for violations only).
- Location (on campus, university controlled non-campus, and public property).
- Calendar year.

## Illinois response to campus crime

Illinois has taken an active role in enhancing safety on college campuses through multidisciplinary task forces, through the provision of equipment and training to colleges.

In the wake of the Virginia Tech shootings in 2007, the State of Illinois Campus Security Task Force was established, comprised of leaders in college administration, law enforcement, public safety and mental health. This task force successfully crafted new and more effective campus security policies and procedures, and recommended legislation aimed at assisting colleges to prepare for, respond to, and recover from emergency and security-related incidents on campus.<sup>41</sup>

As a result, the Campus Security Enhancement Act of 2008 (110 Illinois Compiled Statutes 12/1; Public Act 95-8811) was passed and signed into law in August 2008. In January 2009, Illinois became the first state in the nation to require all colleges in the state to develop and exercise an all-hazards emergency response plan and an inter-disciplinary and multi-jurisdictional campus violence prevention plan. State and local emergency management officials will assist with the development of these plans, as well as with training and exercises related to the plans. The Act also requires the development and implementation of a campus violence prevention committee and campus threat assessment team for each higher education institution.

Another initiative appointed the Illinois Board of Higher Education, the Illinois Community College Board, and the Illinois Campus Law enforcement Administrators to the Illinois Terrorism Task Force to ensure that public safety agencies understand the unique security issues and incidence response requirements specific to college campuses. Representatives from 96 colleges and universities have participated in half day campus security training sessions as of summer 2008. Finally, the State of Illinois, through the Illinois Law Enforcement Alarm System, purchased and distributed 303 radios to 70 colleges and universities in Illinois to increase emergency communications between campus law enforcement and other public emergency response organizations. 43

In 2008, the State of Illinois' Campus Security Taskforce provided training to develop campus community emergency response teams (CERTS) for more than 40 colleges in Illinois. Campus CERTS are teams of campus police, public safety, security, emergency management, emergency services, and other personnel. The goal of the training was to teach the teams about disaster preparedness, fire safety, disaster medical operations, light search and rescue operations, CERT organization, and disaster psychology. A disaster simulation exercise was included in the training.

The Illinois Department of Human Services (IDHS) provides assistance to college campuses and local law enforcement to reduce underage drinking. The program, called Enforcing Underage Drinking Laws, focuses on limiting the consumption of alcohol by minors, the sale of alcohol to minors, and the use of forged identification cards on and around college campuses. In addition, IDHS offers alcohol enforcement training to local law enforcement officers and interested community members around the state, including the use of best practices and the laws surrounding underage drinking. Through this program, the Chicago Police Department has increased the percentage of liquor license holders who have not sold to minors, and the Illinois

## Federal and State response to campus crime

State Police has increased the number of compliance checks, DUI saturation patrols, and party patrols conducted. This program also has assisted the Illinois Higher Education Center to increase the number of college campuses implementing best practices to reduce underage drinking. In addition, an IDHS-funded non-profit agency, Prevention First, Inc., has increased the number of local law enforcement officers who are trained and certified in best practice law enforcement strategies to reduce underage drinking. <sup>44</sup>

## The role of campus law enforcement

The linchpin of campus security and safety is campus law enforcement personnel, including sworn officers, security guards and other safety officials. Their job is to maintain a pleasant, safe, and secure environment by preventing and detecting crime on campus.

According to a 2004-2005 national survey conducted by the Bureau of Justice Statistics (BJS), 74 percent of the 750 law enforcement agencies serving four-year colleges with 2,500 or more students employed sworn law enforcement officers with full arrest powers although not all sworn officers are armed. The number of sworn and armed officers on large campuses however, is increasing. Almost 9 in 10 colleges with sworn officers used armed patrol officers, with some colleges only allowing sworn officers to carry pepper spray and batons rather than guns. Sworn personnel at most colleges also had primary responsibility for crime investigations

Non-sworn officers were much less likely than sworn officers to carry firearms, <sup>45</sup> although about three-fifths of non-sworn officers were authorized to carry pepper spray and about half were authorized to carry batons. Nearly all agencies surveyed stated that they provide routine patrol services, security for special events, and dispatch services. Non-sworn officers were more likely to handle functions related to building security and parking.

BJS found that most campus law enforcement agencies surveyed had 24-hour patrol, a three-digit emergency number, and emergency blue-light phones. 46 Other functions of campus law enforcement may include special event security, violent and property crime investigation, building lockup/unlock/central alarm monitoring, access control (monitoring who accesses the campus), surveillance camera monitoring, and traffic and parking enforcement.

A comparison of the 2004-2005 BJS survey of campus police to a survey conducted in 1994-1995 found that the percentage of campuses using sworn officers stayed essentially the same, at 79 percent and 78 percent, respectively, while those using armed patrol officers increased from 66 percent to 72 percent. The survey also found that private campuses had more law enforcement employees per capita than public campuses.

### **General campus safety tips:**

- Be aware of your surroundings, including people; visualize potential exit routes from an event or location in case of emergency.
- Keep identification on your person at all times.
- Know the location of emergency Blue Light call boxes.
- Try not to walk alone after dark. If you do, utilize well-lit, populated routes on campus. Avoid talking on your cell phone when walking alone.
- Keep emergency numbers in your cell phone and near landline phone, including numbers for the Resident Advisor, campus law enforcement, and health services.
- Trust your instincts, especially if you feel "something isn't right."
- Be aware of what you post on the Internet, especially online social networks like Facebook and MySpace.
- Do not prop open campus building doors, especially in residential buildings.
- Do not accept drinks from strangers.
- Avoid being alone in areas of campus that can often be empty or isolated, such as basement laundry rooms, study lounges, etc.
- If you notice another person in danger, call 911. Do not engage another person who as a weapon or involve yourself in a fight.

Over time, the number of minorities and females patrolling college campuses has slightly increased. Among campus law enforcement agencies surveyed both in 1994-1995 and in 2004-2005, the number of women officers increased from 14 percent to 17 percent and the number of minority officers (Blacks, Hispanics, Asians, and other minorities <sup>47</sup>) increased from 27 percent to 30 percent of total officers.

Starting salaries and the number of agencies requiring a college degree also increased. Campus police departments were more likely than municipal police departments to assess their recruits' community-relations skills prior to hiring and campus police departments were more likely than municipal police departments to require a college degree. However, the starting salary for campus police officers was 6 percent lower than for municipal police officers.

In many cases, campus law enforcement agencies work with local law enforcement agencies. Depending on the type of campus law enforcement agency, local support may include arresting suspects, investigating crimes, providing armed support in dangerous situations, and operating a municipal police substation on campus.

As would be expected, it was found that the larger campuses with larger law enforcement agencies were able to perform a greater variety of duties than the smaller campuses with smaller law enforcement agencies.

The BJS survey indicated that 69 percent of campus law enforcement agencies had incorporated community policing into their campus security policy and almost half had collaborated with citizen groups, using feedback to support community policing strategies. In addition to working with the public in the community, 81 percent of those surveyed stated they also meet regularly with faculty, staff, students and other groups including:

- Other law enforcement agencies.
- Faculty/staff and student organizations.
- Domestic violence and other advocacy groups.
- Neighborhood associations.
- Business and religious groups.

Almost 95 percent of those surveyed by BJS stated their agencies have a written emergency preparedness plan and had met with campus administrators regarding emergency preparedness issues

## General residence hall safety tips:

- Lock doors at all times, especially when you go to sleep.
- Report lost keys immediately; do not loan your keys to anyone.
- Secure valuables and medications at all times.
- Know the location of fire alarms and extinguishers, and be familiar with exits and evacuation procedures.
- Escort your guests at all times and do not let strangers into residence halls.
- Report all suspicious activity to the Residence Advisor or campus law enforcement.

Retrieved on July 14, 2008 from www.campussafetymonth.org/campus\_issues & July 31, 2008 from http://emergency.washcoll.edu/personalsafety.php

during the 2004-2005 school year. Almost 70 percent had disseminated emergency preparedness information to the campus community and had a written plan on how to respond in the event of a terrorist attack. A majority also conducted emergency preparedness exercises and maintained intelligence sharing agreements with other law enforcement agencies. Nearly half of those surveyed stated that partnerships had been formed with culturally diverse organizations both on and off campus to address emergency preparedness on campus. Just more than 20 percent of those surveyed had conducted a campus anti-fear campaign.

The majority of campuses surveyed instituted specialized programs and personnel in campus law enforcement agencies, and provided access to crime prevention programs. These specialized areas of focus included:

- Crime prevention.
- Sexual assault and stalking prevention.
- Drug and alcohol education.
- Mental health services
- Self-defense training.
- Community policing.
- Victim assistance.
- Cyber-crime.
- Hate crime.
- Student security patrol.

Findings from the survey of law enforcement on campuses indicate a greater preparedness to respond not only to rare, random acts of extreme violence, but also to violent incidents that are more likely to take place, such as aggravated battery, rape, or robbery. The collaboration between campus law enforcement, municipal law enforcement, and other groups increase the number of precautionary and preventative steps that can be taken to prevent the more common forms of violence and crime from occurring on college campuses.

Campus law enforcement also can work in conjunction with local law enforcement to ensure safety on and around campuses. In 2008, researchers from Southern Illinois at Carbondale (SIUC) examined critical incident preparedness and response on college campuses. The report focuses on the coordination of efforts between local law enforcement and institutions of higher education in the United States. Through surveys given to campus public safety personnel and local law enforcement agencies researchers found that a majority of campuses implemented new mass communication technologies <sup>48</sup>, revised their emergency response plans, participated in field training exercises, and trained non-safety personnel in emergency response after the Virginia Tech incident. <sup>49</sup>

SIUC researchers found that the vast majority of campuses had a formal written emergency plan in place for most types of critical incidents, whereas about half of local law enforcement agencies indicated that they had a formal written emergency response plan specifying procedures in the event of an emergency on campuses in their jurisdiction. Types of critical incidents most commonly included in the plans were structural fires, weather-related incidents, bomb threats, hazardous materials incidents, and active shooter events. Less commonly mentioned were

## The role of campus law enforcement

hazardous material thefts and structural failures. About 67 percent of the campuses surveyed also provided materials to local law enforcement agencies to facilitate emergency response on campus. <sup>50</sup> The most common material provided were campus maps and building access items such as keys or pass codes.

## Warning signs and possible causes of campus violence

The National Crime Prevention Council (NCPC) reports that most acts of extreme violence on college campuses are preceded by warning signs. These warning signs include, but are not limited to, students:

- Making threats of bringing a weapon to the college.
- Talking about other violent events and committing a copycat crime.
- Overhearing or seeing a "hit list" at the college or online.
- Exhibiting sudden changes in behavior or mood swings.
- Having difficulty controlling anger or handling conflict.
- Experiencing bullying or other means of peer isolation.

Although these are possible warning signs of these types of violent incidents, the presence of any of these does not ensure a violent act will occur.

Research has shown that no single factor causes violence. There are many identified determinants of violence, including both individual characteristics and attributes of campus and community environments. In *Preventing Violence and Promoting Safety in Higher Education Settings* the authors organize determinants of violence into a "social ecological framework," which recognizes that health and safety behaviors are influenced by individual, group, institutional, community, public policy, and societal factors. Types of possible influences for violence on a campus include:

- Individual factors, such as student, faculty, and staff attitudes and beliefs about violence and skills for negotiating conflict.
- Interpersonal processes, such as group norms of appropriate behavior and the responses of witnesses to violence.
- Institutional factors of campus policies and procedures and the existence of settings that may contribute to violence, such as high levels of alcohol consumption on or around the campus.
- Community factors of high rates of violence and drugs in the surrounding community and the extent to which the community's law enforcement has contact with the campus.
- Public policy and societal influences including the enforcement of federal, state, and local laws and statutes and cultural contributors such as male gender role socialization and the media images glamorizing violence.

A violent event may be the result of a combination of some or all of these types of factors. According to the National Research Council, a violent act requires a person with a predisposition for violence to be in a situation that creates a risk of violence and usually is precipitated by a triggering event. <sup>53</sup>

## Recommendations to enhance college campus safety

The complexity of campus crime and violence suggests that efforts to reduce them require multicomponent initiatives designed to address the multitude of contributing factors. Campus administrators recognize that while some incidents of violence are unpredictable and unavoidable, there are ways of identifying and reducing factors that may lead to violence. Fostering a healthy and civil campus environment is more than instituting additional rules and regulations regarding campus crime. Violence prevention and safety promotion are a part of the mission of colleges to make the campus a safe place.

## Proactive measures to enhance campus safety

Campus communities are becoming more aware of measures that can ensure safety and guarantee that information is disseminated to the whole campus in times of emergency. A comprehensive plan to reduce violence and crime on campuses should focus on early intervention and prevention, as well as response-focused measures after a violent incident takes place. Campus communities can begin by addressing attitudes, beliefs, and perceptions that contribute to crime through efforts such as education, skill building, and curriculum infusion. Campus communities should establish comprehensive drug and alcohol prevention programs and self-defense courses. The creation and dissemination of policies and procedures addressing each type of crime, and training programs to ensure that policies are being followed should be a part of the comprehensive plan. A list of support services for students, including mental health services, crisis management, and victim services also should be included in the plan.

According to *Campus Safety Magazine*<sup>54</sup> best practices derived from campus security practitioners for campuses to quickly circulate information in times of emergency include:

- Using a layered approach incorporating several types of technology (email, web announcement, phone calls, flyers, etc.). 55
- Involving the information technology department in the planning process.
- Periodically testing the alert system.
- Determining ahead of time who has the authority to issue emergency alert notices.
- Before an emergency occurs, providing public safety officials with clear guidelines.
- Using the system enough so the campus community understands the value of it, but be careful of overuse.
- Considering the hearing and sight impaired in planning for emergency notifications.
- Educating the campus community on how the system is used and what do expect and do during an emergency situation. <sup>56</sup>
- Increasing lighting in public areas of campus.
- Enhancing security through better equipment (blue light boxes)<sup>57</sup> and more officers.
- Implementing a reverse 911 system to notify students via email or text message of an emergency situation on campus.

## Improved institutional response to campus crime

After the Virginia Tech tragedy in 2008, the International Association of Campus Law Enforcement Administrators convened a campus safety task force to meet with educators, mental health experts, law enforcement, and state and local officials to discuss the issues brought to light with this incident. In its final report, the task force recommended:

## • Critical information sharing protocols.

Education administrators, healthcare providers, law enforcement personnel, etc. should be informed about when they can share critical information on people who may be a danger to themselves or others and the resulting confusion can hinder legitimate information sharing.

- Accurate information on individuals prohibited from possessing firearms.

  State laws and practices do not uniformly ensure that information on people restricted from possessing firearms is appropriately captured and made available to the National Instant Criminal Background Check System (NICS).
- Improved awareness and communication for prevention.

  Parents, students, faculty, and staff need to learn to recognize warning signs and encourage those in need to seek help so that people receive the services they need and campuses remain safe.
- Access to needed services for mentally ill.

  Addressing the needs and challenges of adequate and appropriate community integration of people with mental illnesses requires coordination of community service providers who are sensitive to the interests of safety, privacy, and provision of care on campus.
- Improvement in programs already in place.

  Many post-secondary colleges have already adopted emergency preparedness and violence prevention programs to address college and community violence. The challenge is completely implementing these programs through practice and communication. 58

The task force made several recommendations of how the federal government should help avoid future tragedies by making campuses safer places. These included:

- Establishing a cooperative response and action with local law enforcement.
- Providing support groups and counseling for victims.
- Promoting crime awareness and personal protection campaigns.
- Developing stronger rules and regulations.

## **Summary and conclusion**

This report identified the incidents that inspired federal and state legislative changes regarding campus safety, traced the history of that legislation, and identified steps being taken to ensure that institutions of higher education are safe learning environments for faculty, staff, students, and visitors. This report is the first in a series about campus safety and crime, serving as a framework for the upcoming installments by providing the historical and legislative background necessary for understanding data collected about campus crime in Illinois.

The report reviewed incidents of extreme violence on and around college campuses that have contributed to the creation and implementation of federal and state mandates to ensure the safety and security of students, faculty and staff on campuses.

Federal legislation to address campus crime seeks to increase safety on campuses through transparent reporting of crime and by promoting safety measures. The most inclusive of the federal legislation is the Clery Act, which specifies the requirements for reporting campus crimes to the United States Department of Education for all institutions receiving Title IV funding from the federal government. <sup>59</sup>

Campus crime is a complex problem with no easy solutions. The research summarized in this report suggests that a set of guiding principles and processes developed by campus stakeholders be put in place to guide the work of making safer college campuses. Colleges and universities can begin this process by addressing attitudes, beliefs, and perceptions that contribute to crime through efforts such as education, skill building, and curriculum infusion. The establishment of a comprehensive drug and alcohol prevention programs and self-defense courses is an important step in this process. A list of support services for all students, including mental health services, crisis management, and victim services also should be included in the plan. A comprehensive plan to reduce violence and crime on campuses should focus on early intervention and prevention, as well as precautions and response-focused measures after the violent incident takes place.

## Resources

## The U.S. Department of Education, Office of Postsecondary Education

The U.S. Department of Education is committed to making sure colleges and campuses across the country fully comply with the Clery Act and that campus law enforcement remains a priority. The Department of Education released "The Handbook for Campus Crime Reporting" in 2005, which was designed to assist those who must comply with the act. The step-by-step guide explains the requirements of the Act by guiding users through the regulations. The U.S. Department of Education's Office of Post-Secondary Education also offers a Campus Crime Reporting Training Module on its website, providing an online tutorial to be used in conjunction with the handbook on the requirements of the Clery Act.

## Security on Campus, Inc. (SOC)

Founded by the Clery family after their daughter was slain in 1986, Security On Campus, Inc. (SOC) is a non-profit organization devoted to preventing campus crime and substance abuse on college campuses in the United States, and assisting victims of those crimes. <sup>61</sup> SOC believes that students and parents have the right to know about criminal activity on college and university campuses, and receives federal grant funding to offer campus safety information to parents, students, and staff of colleges across the country, provide training to officers to enhance the reliability of the data submitted to the federal government under the Clery Act, and work with victims of crime on campuses to ensure appropriate services are available.

In 2008, the International Association of Campus Law Enforcement Administrators, International Association of Chiefs of Police, and National Association of Student Personnel Administrators partnered with SOC to provide annual training for college administrators and law enforcement on how to best comply with Clery Act reporting requirements. Each session was taught by an expert in the field and incorporated interactive exercises to promote a collaborative approach to addressing crime on campus. The curriculum was developed with assistance from campus police, student affairs, and campus victim advocate representatives, and is offered around the country.

#### **Notes**

http://www.securityoncampus.org/index.php?option=com\_content&view=article&id=52.&Itemid=71.

http://topics.nytimes.com/topics/reference/timestopics/people/s/matthew\_shepard/index.html.

http://topics.nytimes.com/topics/reference/timestopics/organizations/n/northern\_illinois\_university/school\_shooting/index.html.

http://www.securityoncampus.org/index.php?option=com\_content&view=article&id=884.

http://www.coe.uga.edu/chds/dtae/Readings/Complying%20with%20the%20Congressional%20Mandates%20and%20the%20Practice%20of%20Student%20Affairs.pdf.

http://www.securityoncampus.org/index.php?option=com\_content&view=article&id=133&Itemid=27.

<sup>&</sup>lt;sup>1</sup> Retrieved January 26, 2010 from http://www.ojp.usdoj.gov/ovc/assist/nvaa99/chap21-4.htm

<sup>&</sup>lt;sup>2</sup> Retrieved January 26, 2010 from http://www.localhistories.org/oxford.html.

<sup>&</sup>lt;sup>3</sup> Retrieved February 25, 2010 from http://news.bbc.co.uk/2/hi/south asia/1654332.stm

<sup>&</sup>lt;sup>4</sup> Retrieved January 26, 2010 from http://www.time.com/time/2007/crimes/9.html.

<sup>&</sup>lt;sup>5</sup> Retrieved January 26, 2010 from http://www.cbsnews.com/stories/2007/04/16/national/main2689785.shtml.

<sup>&</sup>lt;sup>6</sup> Retrieved January 26, 2010 from http://dept.kent.edu/sociology/lewis/lewihen.htm.

<sup>&</sup>lt;sup>7</sup> Retrieved January 26, 2010 from http://www.crimemagazine.com/ted\_bundy.htm.

<sup>&</sup>lt;sup>8</sup> Retrieved January 26, 2010 from http://www.stophazing.org/fraternity\_hazing/index.htm

<sup>&</sup>lt;sup>9</sup> Retrieved January 26, 2010 from

<sup>&</sup>lt;sup>10</sup> Retrieved January 26, 2010 from http://www.usatoday.com/news/nation/2006-10-25-college-killer-execution\_x.htm.

<sup>11</sup> Retrieved January 27, 2010 from http://www.time.com/time/magazine/article/0,9171,973077,00.html.

<sup>&</sup>lt;sup>12</sup> Retrieved February 25, 2010 from http://www.iaclea.org/visitors/PDFs/VT-taskforce-report\_Virginia-Tech.pdf.

<sup>13</sup> Ibid

<sup>&</sup>lt;sup>14</sup> Retrieved January 27, 2010 from http://web.mit.edu/newsoffice/1998/da-0923.html.

<sup>&</sup>lt;sup>15</sup> Retrieved March 1, 2010 from http://www.nytimes.com/1998/10/13/us/gay-man-dies-from-attack-fanning-outrage-and-debate.html

<sup>&</sup>lt;sup>16</sup> Retrieved January 27, 2010 from

<sup>&</sup>lt;sup>17</sup> Retrieved January 27, 2010 from http://www.ndsn.org/mayjun98/alcohol.html.

Retrieved February 25, 2010 from http://www.iaclea.org/visitors/PDFs/VT-taskforce-report\_Virginia-Tech.pdf.

<sup>19</sup> Ibid

<sup>&</sup>lt;sup>20</sup> Retrieved December 2, 2008 from

<sup>&</sup>lt;sup>21</sup> Ibid

<sup>&</sup>lt;sup>22</sup> Retrieved January 27 from http://abclocal.go.com/wls/story?section=news/local&id=5958122.

<sup>&</sup>lt;sup>23</sup> Retrieved January 27, 2010 http://abclocal.go.com/wls/story?section=news/local&id=6079254. ABC7 reported that two messages were found on April 5, and both threats were non-specific. On April 10, another threat stating "Be prepared to die 4/14" was found on a dormitory bathroom wall.

<sup>&</sup>lt;sup>24</sup> Ibid

<sup>&</sup>lt;sup>25</sup> The 1998 amendments to the Higher Education Act of 1965 allow for the names students who have been disciplined for violent crimes, non forcible sex offenses and drug and alcohol violations to be disclosed. Retrieved January 27, 2010 from www2.ed.gov/policy/highered/leg/hea98/index.html.

<sup>&</sup>lt;sup>26</sup> Retrieved January 27, 2010 from http://content.nejm.org/cgi/content/full/357/2/105.

<sup>&</sup>lt;sup>27</sup> Roark, M. L. "Conceptualizing Campus Violence: Definitions, Underlying Factors and Effects: *Journal of College Student Psychotherapy* 8(1/2): 1-27, 1993. National Association of Student Personnel Administrators.

<sup>&</sup>lt;sup>28</sup> Retrieved January 27, 2010 from http://www.higheredcenter.org/mandates/dfsca

<sup>&</sup>lt;sup>29</sup> Retrieved September 28, 2008 from http://www.higheredcenter.org/mandates/dfsca.

<sup>&</sup>lt;sup>30</sup> Retrieved January 27, 2010 from http://education.stateuniversity.com/pages/1922/Drug-Alcohol-Abuse-COLLEGE.html.

<sup>&</sup>lt;sup>31</sup> Retrieved January 27, 2010 from

<sup>&</sup>lt;sup>32</sup> Retrieved November 20, 2008 from

Retrieved April 16, 2008 from http://www.ed.gov/admins/lead/safety/handbook-part-1.pdf

<sup>&</sup>lt;sup>34</sup> Retrieved January 27, 2010 from

<sup>36</sup> Retrieved July 14, 2008 from http:epic.org/privacy/education/ferpa.html.

<sup>38</sup> Retrieved April 16, 2008 from www.securityoncampus.org/colleges/cleryact/cleryact.html.

<sup>39</sup> Although data has been submitted since 1991, data are only available from 2001 through 2006.

- <sup>40</sup> Title IV schools are those receiving funding through the Safe and Drug-Free Communities Act. In order to receive this funding the schools must meet certain requirements such as organizing activities for the prevention of drug use and violence among students. US Department of Education (USDOE) that enables the college to receive and award Title IV Financial Aid program funds. Title IV Financial Aid Programs include the Federal Pell Grant, the Federal Supplemental Educational Opportunity Grant, the Federal Subsidized Stafford Loan, the Federal Unsubsidized Stafford Loan and Federal Work Study. Retrieved March 2, 2010 from <a href="http://www2.ed.gov/about/offices/list/ope/policy.html">http://www2.ed.gov/about/offices/list/ope/policy.html</a>.
- <sup>41</sup> The mission of the CSTF was to develop and implement comprehensive, coordinated policies and training programs to deter, prevent and enhance response to, and recovery from major public safety incidents at all higher education campuses in Illinois. Retrieved March 1, 2010 from www.ready.illinois.gov/pdf/CSTF Report PartI.pdf.

<sup>42</sup> Retrieved March 1, 2010 from www.ready.illinois.gov/pdf/CSTF\_Report\_Part1.pdf.

<sup>43</sup> Retrieved July 14, 2008 from

www.illinois.gov/pressreleases/PrintPressRelease.cfm?SubjectID=3&RecNum\_6252 and http://www.ileas.org/campus radios/Main.htm.

<sup>44</sup> Retrieved August 18, 2008 from www.dhs.stete.il.us/page.aspx?item+32848.

<sup>45</sup> According to BJS, 67 percent of non-sworn officers were authorized to carry firearms compared to 90 percent of sworn officers on college campuses. Retrieved March 2, 2010 from http://bjs.ojp.usdoj.gov/content/pub/ascii/cle0405.txt.

<sup>46</sup> "Blue light" telephones provide a toll-free, direct connection to the campus law enforcement. These phones are located throughout the most college campuses either inside or outside of residence halls, administrative and academic buildings.

<sup>47</sup> Other race includes American Indian, native Hawaiian/other Pacific Islander, and persons identifying two or more races.

<sup>48</sup> Most campuses have four mass communication mechanisms, the most common of which are email, web page, non-cellular telephones, and cellular telephones/text messaging.

<sup>49</sup> Giblin, Matthew J., Burruss, George W., and Schafer, Joseph A. "Critical Incident Preparedness and Response on Campus: Examining the Relationship Between Local Law Enforcement and Post-Secondary Institution s in Illinois and the United States". Carbondale, IL: Center for the Study of Crime, Delinquency & Corrections, 2009. <sup>50</sup> Ibid.

<sup>51</sup> Reiss, A. J., Jr., and Roth, J.A. *Understanding and Preventing Violence, Volume 1. Panel on the Understanding and Control of Violent Behavior:* Washington DC: National Academy Press, National Research Council, 1993.

<sup>52</sup> Langford, Linda. "Preventing and Promoting Safety in Higher Education Settings: Overview of a Comprehensive Approach". Washington DC: US Department of Education, The Higher Education Center for Alcohol and Other Drug Abuse and Violence Prevention, 2008.

<sup>53</sup> A triggering event is a description of the immediate circumstances surrounding an act of violence and is not intended to convey a lack of responsibility of the offender. A triggering event can occur at a social level or within an individual impairing decision-making.

<sup>54</sup> Retrieved March 10, 2010 from

ttp://www.campussafetymagazine.com/MassNotification/BestPractices/?ArticleID=243&page=8.

<sup>55</sup> Following the trend that began after the Virginia Tech tragedy, Joliet Junior College became the latest college to adopt a new emergency notification system. On July 1, 2008, Joliet Junior College announced plans to use a new emergency notification platform for its main campus. The Campus Alerts system allows for instant dissemination of information to and from communication devices such as cell phones, email, pagers, land line telephones and SMS. Retrieved July 12, 2008 from www.campussafetymaazine.com/Print/?NewsID+2031.

<sup>56</sup> Gray, Robin Hattersley, "Best Practices Breakdown," Campus Safety Magazine, May/June 2008.

<sup>&</sup>lt;sup>35</sup> Retrieved July 14, 2008from http://www.nytimes.com/1993/03/07/magazine/the-campus-crime-wave.html?pagewanted=1. Matthews, Anne. "The Campus Crime Wave." *The New York Times*. (1993).

<sup>&</sup>lt;sup>37</sup> Megan's Law provides information and notification to communities when potentially dangerous sex offenders move into the community. The nature of the notification varies from state to state, however, as a result of the system; every state now attempts to keep track of the residence of sex offenders, and to provide information to the public. Retrieved February 1, 2010 from http://www.meganslaw.com/.

http://media.www.thefamuanonline.com/media/storage/paper319/news/2008/04/16/News/Blue-Light.Special.Campus.Call.Boxes.Increase.Safety-3327837.shtml

<sup>58</sup> U.S. Department of Education. *Report to the President on Issues Raised by the Virginia Tech Tragedy.* Washington DC: U.S. Department of Education, June, 2007.

2005
61 Retrieved April 28, 2008 from http://www.securityoncampus.org/aboutsoc/index.html.

<sup>&</sup>lt;sup>57</sup> Defines as a system intended to function as a 911 service for students in emergency situations, provides 24-hour direct connection service to the call center.

<sup>&</sup>lt;sup>59</sup> An institution that has a written agreement with a Secretary of Education that allows the institution to participate in any of the Title IV federal student financial assistance programs (other than the State Student Incentive Grant (SSIG) and the National Early Intervention Scholarship and Partnership (NEISP) programs).

60 The Handbook for Campus Crime Reporting, U.S. Department of Education, Office of Post-secondary Education.