



Cover Memorandum

Clery Act Compliance, JHPD Directive #222

Purpose of the Directive

The purpose of this Directive is to communicate and establish procedures for the Johns Hopkins Police Department (JHPD) for compliance with The Jeanne Clery Disclosure of Campus Security Directive and Campus Crime Statistics Act (Clery Act).

Summary of Directive Requirements

This Directive establishes the procedures for complying with statutory and regulatory requirements of the Clery Act. It is the policy of the JHPD and Johns Hopkins Public Safety (JHPS) to comply with all provisions of the Clery Act, to include alerting the campus community through timely warnings of a serious or continuing threat to safety and issuing emergency notifications for imminent or impending threats in accordance with [JHU Campus Notifications \(GOV036\)](#).

The JHPD also maintains a daily crime and fire log that is accessible by the general public, in addition to publishing an Annual Security and Fire Safety Report that identifies certain policies, procedures, and resources.

In addition to the annual reporting of crime statistics to the U.S. Department of Education, the JHPD publicly discloses three years of crime and fire statistics.

Blueprint for the Policy Development Process

The draft JHPD policies (hereinafter referred to as “directives”) shared for community feedback are based on examples of 21st century best practices in public safety policy, identified through extensive benchmarking of university and municipal law enforcement agencies across the nation. Taken together, they represent a comprehensively progressive approach to policing that prioritizes equity, transparency, accountability, and community-based public safety strategies.

The JHPD’s draft directives embody approaches that community advocates and leading experts have championed locally and in law enforcement reform efforts across the nation. The draft directives have also been developed based on input received through robust community engagement in prior phases of JHPD development, including suggestions received in the legislative process as well as last fall’s Memorandum of Understanding (MOU) public comment period and feedback opportunities.

In addition, the directives were drafted to exceed the minimum requirements of the Constitution and laws of the United States and the State of Maryland, to align with the Community Safety and Strengthening Act (CSSA) and to fulfill the requirements of the MOU between the Johns Hopkins

University and the Baltimore Police Department. The Hopkins community and our neighbors throughout Baltimore can help improve and strengthen these directives further through their feedback and input.

Material that was considered in the drafting of the Directive and Procedure Manual, include:

a. Publicly available policies from municipal police departments that have undergone substantial reform efforts, including: the New Orleans Police Department; Seattle Police Department; Portland Police Department; Detroit Police Department; Ferguson Police Department; and Baltimore Police Department;

b. National guidance on best practices and model policies from criminal justice reform efforts, social science research centers, and civil rights organizations, including: the Leadership Conference on Civil and Human Rights; American Civil Liberties Union (ACLU), including the ACLU of Massachusetts’s “Racially Just Policing: Model Policies for Colleges and Universities”; the International Association of Chiefs of Police (IACP); the Police Executive Research Forum (PERF); U.S. Department of Justice Office of Community Oriented Policing Services (COPS Office); The Justice Collaboratory (The JC) at Yale University Law School; and The Center for Innovation in Community Safety (CICS) at Georgetown Law School.

c. National and local higher education institutions that are based in comparable environments and make policies publicly available, including: Carnegie Mellon University; Morgan State University; Towson University; University of Chicago; University of Cincinnati; University of Maryland, Baltimore County; University of Pennsylvania; and Yale University.

To ensure that the proposed directives captured national best practices in community-focused public safety services, the development team collaborated with independent experts from two organizations: National Policing Institute (the Institute), a non-profit dedicated to advancing excellence in policing through research and innovation, and 21CP Solutions, an expert consulting team of former law enforcement personnel, academics, civil rights lawyers, and community leaders dedicated to advancing safe, fair, equitable, and inclusive public safety solutions. Each directive was reviewed by experts selected by both organizations, who provided feedback, suggestions, and edits that were fully incorporated into the current draft.

Finally, individuals and organizations representing the diversity of the Johns Hopkins University community provided feedback to ensure the policies and procedures reflect and respond to the values of our institution and to our community’s public safety service needs.

Now they are available for your review. Johns Hopkins is committed to adopting, incorporating, or otherwise reflecting recommended changes and feedback in the final version of policies so long as feedback is aligned with our values and commitments, permissible within legal parameters, and supported by national best practices for community policing and public safety.



POLICE DEPARTMENT

**CLERY ACT
COMPLIANCE**

**ADMINISTRATIVE
PROCEDURE #222**

Responsible Executive:
Chief of Police
Responsible Office:
Vice President for Public Safety
Approved by:
Dr. Branville G. Bard, Jr.
Issued: [full date]
Revised: [full date]

Table of Contents

POLICY STATEMENT1

WHO IS GOVERNED BY THIS POLICY.....1

PURPOSE1

POLICY.....2

PROCEDURES2

POLICY ENFORCEMENT7

RELATED RESOURCES7

CONTACTS7

Policy Statement

The Clery Act, signed in 1990, was originally known as the Crime Awareness and Campus Security Act. The act was renamed the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (shortened to the Clery Act) in 1998. The law is named for Jeanne Clery, a 19-year-old Lehigh University freshman who was murdered in her campus residence hall in 1986. The backlash against unreported crimes on numerous campuses across the country led to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act.

Who is Governed by this Policy

All personnel, including sworn, non-sworn and contractual or voluntary persons in service with the Johns Hopkins Police Department (JHPD) are governed by this Directive.

Purpose

The purpose of this Directive is to establish procedures for the JHPD’s responsibilities to the Johns Hopkins University (JHU) in fulfilling JHU’s obligation for compliance with The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act).

Policy

It is the policy of the JHPD through Johns Hopkins Public Safety (JHPS) to comply with all provisions of the Clery Act. It is the policy of the JHPD and JHPS to alert the campus community through “timely warnings” of a serious or continuing threat to safety, to maintain a daily crime and fire log accessible by the general public, to publish an annual security and fire safety report that discloses policies and procedures and three years of crime and fire statistics, and to report crime statistics to the U.S. Department of Education annually.

Procedures

I. Requirements

- A.** The Clery Act requires higher education institutions to develop, implement, and disclose campus security, fire, missing persons, and evacuation policies and procedures, to:
- Alert the campus community through “timely warnings” of a serious or continuing threat to safety,
 - Develop and maintain a daily crime and fire log,
 - Develop and distribute an annual security and fire safety report that discloses policies and procedures and three years of crime and fire statistics that occurred on campus, in the institution’s residential facilities, in non-campus buildings, or on public property, and
 - Report crime statistics to the U.S. Department of Education annually.
 - The Clery Act also requires that JHU issues emergency notifications for an immediate or pending threat to campus.
- B.** The following offenses, must be included in the annual Clery report, and sent to the U.S. Department of Education: (Commission on Accreditation for Law Enforcement Agencies (CALEA) 91.4.1.b)
- Criminal homicide:
 - Murder and non-negligent manslaughter
 - Negligent manslaughter
 - Sexual offenses:
 - forcible
 - non-forcible
 - Robbery
 - Aggravated assault
 - Burglary
 - Arson
 - Motor vehicle theft
 - Domestic & intimate partner violence
 - Stalking

- Arrest and/or disciplinary referrals for:
 - Liquor-law violations
 - Drug-law violations
 - Illegal weapons possession
 - NOTE: Institutions are required to release statistics concerning hate crimes and shall indicate every occurrence of crime involving bodily injury, in which the victim was targeted because of their actual or perceived race, gender, religion, sexual orientation, gender identity, ethnicity, or disability.
- C. The JHPD Clery Act Coordinator shall be responsible for compliance with all requirements of the Clery Act, to include but not limited to: (CALEA 91.4.1)
- Arranging for training when needed,
 - Assisting with interpretation of Clery Act requirements, and
 - Serving as liaison with the Vice President of JHPS and Chief of Police, all members of the JHPS and JHPD senior leadership team, the City of Baltimore Police (BPD) and Fire Departments, University and Medicine Emergency Management and Regulatory leaders, the Crime Analyst, and Records Unit Personnel regarding Clery Act matters.
- D. The Clery Act Coordinator or their designee is responsible for the enterprise-wide review of all incident reports, including criminal incident reports, and determining the incident classification.
- E. **Crime Log** - The JHPS Crime Data Analyst maintains a Daily Crime Report and a separate Fire Log of all incidents reported to the JHPD and JHPS personnel. This includes all crimes, incidents related to fires, and other serious incidents that occur within the JH (Johns Hopkins) designated Patrol Areas, including on campus, in areas jointly patrolled by the JHPD and the BPD, in buildings or properties not affiliated with JH, on public property, or within the JHPD Patrol Zone.
- Each JHPS Site Director shall also receive and review the BPD Crime Briefings and check the JHPD and JHPS records for accuracy.
 - Records personnel, with assistance from of the Director of Special Services and Clery Act Coordinator, will compare the BPD Crime Briefing with the JHPD Daily Crime Report to verify accuracy.
 - The Clery Act Coordinator will notify the Deputy Chief of the Support Services Bureau or their designee about any criminal incidents that are listed in the BPD Weekly Crime Report that do not appear in departmental records or the Crime Log.

- JHPD Investigations will conduct a follow-up investigation of these incidents and, when required, enter the pertinent information into the Crime Log as an identifiable “late” entry.
 - The Daily Crime Report and separate Fire Log include the incident type, date the incident is reported, date and time of occurrence, general location of each reported incident type, and the disposition of the incident, if this information is known.
 - The JHPS Clery Compliance Director and the Crime Data Analyst or their designee post specific incidents in the Daily Crime Report and Fire Log within two (2) business days of receiving a report of an incident and reserve the right to exclude reports from the log in certain circumstances as permitted by law or when doing so would compromise an active criminal investigation or pose a threat to the victim.
 - The JHPS gives the public 24/7 general access to ALL crime data in the JHPD Patrol Zone via the 60-day Crime Log available online. Printed copies are available on request. A copy may also be obtained from the lobby of JHPS at 3001 Remington Avenue, Baltimore, MD.
- F. The JHPS also submits the Daily Crime Report and Fire Log to the JH journal of record, The Almanac, for weekly publication. They are also available online at <https://publicsafety.jhu.edu/clery-and-crime-data/crime-fire-logs/>
- Upon request, the Daily Crime and Fire Log, including incident descriptions, is provided weekly to JH, and is available online at <https://publicsafety.jhu.edu/clery-and-crime-data/crime-fire-logs/>.
- G. When the JHPD becomes aware of criminal incidents that constitute an ongoing or continuing threat to the campus community, the JHPS shall issue a timely warning to the community by activating the JHU/ Johns Hopkins Medical Institute (JHMI) ALERT system in conformance with [\(GOV036\) Campus Notifications](#) and/or a JHPS campus specific Standard Operation Procedure (SOP). (CALEA 91.1.5.b)
- Depending on the particular circumstances, a timely warning may be disseminated by using one or a combination of the following: e-mail, various campus publications, the JHPS and JHU websites, crime alerts, flyers posted at various locations on campus, and/or activation of the JHMI or JHU ALERT system. (CALEA 91.1.5.c)

II. Annual Disclosure of Crime Statistics

- A. The JHPD, through the Crime Data Analyst and Clery Compliance Coordinator, publishes and distributes the Annual Security & Fire Safety Report on a yearly

basis. The statistics collected conform to the Federal Bureau of Investigation's National Incident Based Reporting System requirements.

- B.** The JHPS prepares this report to comply with the Clery Act. The full text of this report can be located on the JHMI or JHU website at:
<https://publicsafety.jhu.edu/clery-and-crime-data/clery/>.
- C.** The Annual Security & Fire Safety Report includes the following JHU policies and procedures:
- Reporting a crime,
 - Timely warnings,
 - Emergency preparedness,
 - Emergency notification system,
 - Rape and sexual violence,
 - Relationship violence,
 - Weapons policy,
 - Alcohol and drugs policy,
 - Disciplinary policies,
 - Missing persons,
 - Security of residence,
 - Use of facilities,
 - The Clery Act,
 - Hate crimes,
 - Campus crime statistics,
 - Crime statistics for noncontiguous properties, and
 - University fire policies.
- D.** The Annual Security & Fire Safety Report also includes information about the JHU Gender-Based Violence Prevention program, which may be accessed at:
<https://studentaffairs.jhu.edu/chew/gender-violence-prevention/> for greater detail on the rights of victims of sexual assaults, including:
- Confidentiality,
 - Academic and housing accommodations,
 - Counseling, and
 - Outside resources.
- E.** Additional information regarding the JHU Sexual Violence and Misconduct programs can be found online using the following links:
- JHU Student Health Service website:
<https://wellbeing.jhu.edu/HealthPromotion/services/>
 - JHU Violence prevention website:
<https://wellbeing.jhu.edu/HealthPromotion/confidential-resources/>

III. Crime Statistics

Under the Clery Act, the JHU's annual statistics must include crimes reported to campus security authorities. The term "campus security authorities" is defined as "campus security officials and campus officials with significant responsibility for student and campus activities."

- A. The U.S. Department of Education considers disciplinary officers, counselors, deans, athletic coaches, and student affairs professionals to be among the officials who have an obligation to provide information for the preparation of crime statistics. These and other responsible officials, in turn, must ensure that others within their school or unit inform them about incidents that may be reportable even when those incidents do not, for whatever reason, result in police reports or investigations.
 - In conformance with JHPD Directive #470, Field Reporting System, all members shall ensure that all Clery Act covered offenses are reported to the Clery Act Coordinator or their designee.
- B. The information provided to JHPS by other institutional officials **shall not** include personally identifiable information about victims or anyone involved in the incident. In addition, officials are not expected to decide whether a crime has occurred or how to categorize possible crimes. Their role is to provide relevant information about possible offenses to the JHPS.
- C. Two categories of school officials deemed to have significant responsibility for student and campus activities are exempted from this reporting requirement:
 - Pastoral Counselor: A person who is associated with a religious order or denomination, is recognized by that religious order or denomination, or someone who provides confidential counseling and is functioning within the scope of that recognition as a pastoral counselor.
 - Professional Counselor: A person whose official responsibilities includes providing mental health counseling to members of the Institution's community and is functioning within the scope of their license or certification.
- D. The U.S. Department of Education has specifically stated that the reporting exemption is not intended to relieve nonprofessional and informal counselors from the reporting obligations.
- E. On a yearly basis the JHPS shall submit a crime statistics report to the U.S. Department of Education.

IV. Officers Assigned to Other Agencies

Officers assigned to or assisting other law enforcement agencies will be guided by this Directive.

Policy Enforcement

Enforcement	JHPD managers and supervisors are responsible for enforcing this Directive.
Reporting Violations	Suspected violations of this Directive should be reported to the Chief of Police through the Clery Act Coordinator.

Related Resources

University Policies and Documents
Operational Procedure #470, Field Reporting System (GOV036) Campus Notifications JHPS SOP, Homewood Campus, Notifications & Timely Warnings JHPS SOP, Peabody Campus, Notifications & Timely Warnings JHPS SOP, East Baltimore Campus, Notifications & Timely Warnings
External Documentation
Police Department Forms and Systems

Contacts

Subject Matter	Office Name	Telephone Number	E-mail/Web Address
Policy Clarification and Interpretation			