Understanding the use of crisis communication in Clery Act compliance

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UNDERSTANDING THE USE OF CRISIS COMMUNICATION IN
CLERY ACT COMPLIANCE

An Abstract of a Dissertation
Submitted
in Partial Fulfillment
of the Requirements for the Degree
Doctor of Education

Approved:

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Dr. David Schmid, Chair

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Dr. Jennifer Waldron
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May 2021
ABSTRACT

This research explores the experiences of eight individuals with positional responsibility for the implementation of the Clery Act as a part of a college or university campus community, specifically seeking to understand the use of crisis communication theory in the issuance of timely warnings. Qualitative methods, specifically semi-structured interviews and a content analysis of previously issued timely warnings, were employed. These methods allowed the researcher to explore and seek understanding of a focused area of Clery Act compliance while hearing directly from the individuals charged with managing a detailed and ever complicated process in their efforts to protect their campus communities. Crisis communication theoretical perspectives, including risk communication, renewal theory, and the hear-confirm-understand-decide-respond model of crisis communication were explored for comparison with the steps standardly taken by participants in the issuance of a timely warning. Through this study participants expressed their dedication to the time-consuming, detailed oriented processes associated with Clery to protect their campus communities, albeit with challenges. Specific training for the use of crisis communication theory, the intentional use of crisis communication theory in the issuances of timely warnings, nor collaboration with campus experts for crisis communication was found. The study found that the length of time an individual works with the Clery Act through their career may be the strongest indicator of whether or not they will utilize crisis communication theoretical perspectives in the issuance of a timely warning, not training or established relationships.

Keywords: Clery Act, Police, Jean Clery
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Approved:

Dr. David Schmid, Chair

Dr. Jeffrey Brand, Committee Member

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May 2021
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To my better half and biggest competition, six years later we did it!

To Harper and Liam, “You are braver than you believe, stronger than you seem, smarter than you think, and loved more than you’ll ever know,” A.A. Milne.

To my family for their never-ending encouragement and support.

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To all of the first-generation college students who never thought college was possible. If I was able to do it not once, not twice, but three times, you can too!
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CHAPTER 1
INTRODUCTION

At 3:00 p.m., on February 14, 2008, on the Northern Illinois University (NIU) campus, Steven Kazmierczak entered a lecture hall in Cole Hall opening fire on the classroom of 162 students. After shooting 21 people, five fatally, Kazmierczak killed himself. At 3:03 p.m., NIU police responded. Seventeen minutes later an all-campus alert was sent via the campus website, e-mail, voicemail, and through various alarm systems (Bohn, 2008). With minimal social media presence, unofficial Facebook pages quickly sprung up. In the hours following, a website created by the University listed the names of the victims and created an official forum for individuals to post their condolences (Northern Illinois University, 2010).

Eight years later, on November 28, 2016, at 9:52 a.m., as Ohio State University (OSU) students returned to campus from their Thanksgiving break, Somali refugee Abdul Razak Ali Artan rammed his car into pedestrians before stabbing those around him with a butcher knife. A campus police officer killed the suspect within a minute of the start of his attack after the suspect failed to comply with the officer’s commands. At 9:55 a.m., three minutes after the attack started, the OSU alert system sent out its first message (Korn et al., 2016). Four minutes after the reported start of the incident, at 9:56 a.m., OSU Emergency Management tweeted, “Buckeye Alert: Active Shooter on campus. Run Hide Fight. Watts Hall. 19th and College” (Blau et al., 2016, para. 34). The stark contrast of the timing of these two responses, coupled with the types of communication used,
demonstrates the evolution our society has experienced in expecting these and other types of crisis as well as how we communicate.

The evolution of technology, social media, and institutional web presence has changed the time, tempo, and language being used to communicate with stakeholders during a crisis. Institutions of higher education have two unique stakeholder groups: internal stakeholders including students, faculty and staff, and external stakeholders including the local community, parents, and alumni, who are seeking instant communication during times of crisis. Social media has added new dimensions for crisis management practitioners to consider, including that news travels faster and further (Gonzalez-Herrero & Smith, 2010). Simultaneously, college campuses have furthered their roles as open campuses, beacons for public events, public lectures, political rallies, and athletic competitions, bringing outsiders of our campus community into our home spaces (Rund, 2002). One-way communication through the web has been replaced with interactive and dynamic communication through social media. This two-way communication provides the opportunity for messaging to internal and external stakeholders that addresses their individual needs within minutes of a crisis occurring (Crandall et al., 2014).

The communication distributed by NIU and OSU attempted to help protect the campus community during moments of crisis but also met requirements for college campuses set forth by the Clery Act. Emergency notification and timely warnings under the 1990 Clery Act are both intended to help protect the campus community. While the requirement to communicate is prescribed by the Act, there is little to no information on
how messages are developed, the use of crisis communication theory in the development, the training or educational backgrounds of the individuals crafting or sending the message, or the impact of messaging on college students.

Significance

The 1990 Jeanne Clery Act exists to provide transparent information to potential students, their parents, and members of a campus community in order to make informed decisions to keep themselves safe while reducing crime on and within the campus community (Gregory & Janosik, 2002; Janosik & Plummer, 2005; Sells, 2002). The statistics provided through an institution’s Annual Security Report (ASR) and its subsequent distribution put this information at the consumers’ fingertips. The impact of that information gathered through Clery reporting and the steps taken by institutions of higher education, such as compliance with the issuance of timely warnings has minimally been studied since the Act’s introduction.

Research Problem and Research Questions

At Title IV funded institutions of higher education, at least one individual, typically referred to as the Clery Compliance Officer or Clery Compliance Manager, has the responsibility and authority necessary to ensure the requirements set forth by the Clery Act are fulfilled. Included in these responsibilities is the creation of institutional policy for emergency response procedures such as emergency warnings and timely alerts. The purpose of this study is to explore and understand the training and educational experiences of Clery Compliance Officers in relationship to the use of crisis communication.
Changes in technology, the use of social media as a means of communication during campus emergencies, and the lived experiences of our students and their parents have changed the communication expectations of our campus stakeholders during a crisis. No previous work has explored the training, experiences, and understandings of the individuals issuing these types of messages during a crisis.

This use of qualitative methods in this study allowed individuals involved in the issuance of a timely warning to share their education and training experiences related to crisis communication. Exploring this area could enhance the Act and its goals to make our campuses safer. This study explored three research questions:

1. How do the individuals with responsibility for issuing timely warnings describe their training and education related to crisis communication?
2. What role does collaboration with campus partners play in crafting timely warning messages?
3. How is crisis communication used in the messaging of timely warnings?

The results of this research should identify if crisis communication approaches are being utilized in the creation of timely warning messaging, subsequently challenging whether or not the current instructions provided in the Clery Handbook on the issuance of a timely warning should be more specific.

Definition of Terms

**Annual Security Report:** An annual publication required of Title IV funded institutions that shares institutional specific information related to campus policies, crime rates, programming and security related information. ASR’s must be available online and
in print to prospective students, their parents, and individuals currently affiliated with the campus community (McNeal, 2007; U.S. Department of Education, 2016).

**Clery Act:** The Student Right-to-Know and Campus Security Act requiring the development of policies and practices that raise awareness and provide resources related to sexual assault, alcohol and drug use, and other forms of crime at institutions of higher education (McCallion, 2014).

**Clery Geography:** Buildings or property that fit into one of three categories, on-campus, public property, or non-campus as defined by the Clery Act (U.S. Department of Education, 2016).

**Communication:** The meaning making process that occurs between the senders and receivers of information. As the field of communication has developed with time, questions have been posed about sociological influences, the influences of personal experiences on the interpretation of messaging, and the methods used to communicate (Sellnow & Seeger, 2013).

**Crime Log:** A database maintained by the institution police or public safety department with up-to-date record of reported crimes and alleged crimes (U.S. Department of Education, 2016).

**Crisis:** “A specific, unexpected, non-routine event or series of events that creates high levels of uncertainty and a significant perceived threat to high priority goals” (Seeger et al., 2003, p. 7).

**Crisis Communication Theory:** “The ongoing process of creating shared meaning among and between groups, communities, individuals and agencies, within the
ecological context of a crisis for the purpose of preparing for and reducing, limiting and responding to threats and harm” (Sellnow & Seeger, 2013, p. 13).

**Higher Education:** Institutions that provide undergraduate and/or graduate education (Janosik & Gehring, 2003; McNeal, 2007).

**Timely Warnings:** Communication required by the Clery Act to the campus community that provides information for an individual to make informed decisions about their safety when there is an ongoing threat to the campus community (U.S. Department of Education, 2016).
CHAPTER 2
LITERATURE REVIEW

This literature review sought to evaluate literature related to the creation and implementation of the Clery Act, the use of crisis communication theory and practical approaches in the creation of timely warnings, and the educational and training experiences of individuals responsible for writing and administering timely warnings. This literature review is organized into three primary areas: (1) The Clery Act, (2) Crisis Communication, and (3) Educational and Training experiences of Clery Compliance Officers.

The Clery Act

In 1990, following public criticism and advocacy regarding crime on college and university campuses, Congress enacted the Student Right-to-Know and Campus Security Act. Leading advocates of the legislation included Howard and Connie Clery, parents of Jeanne Clery, who was found raped and murdered while living on the LeHigh University campus in Pennsylvania in 1986 (Sells, 2002).

Background Information

Howard and Connie Clery last saw their daughter on an April morning in 1986 when they dropped her back off at the LeHigh University campus after spring break. Five days later she was found raped, sodomized, beaten, bitten, strangled, and mutilated on the floor of her residence hall room. Clery’s killer, Joseph Henry, a 20-year-old fellow student, had boasted to his friends about the murder and was in possession of some of Clery’s belongings when found by police (Gross & Fine, 1990). Henry had entered
Clery’s residence hall through a pizza box propped door after a night filled with binge drinking. During Henry’s trial, the Clery’s learned of the lapses in Lehigh’s security and of the recent increase in crime in the area (Gross & Fine, 1990).

At the time of Clery’s death, Lehigh had 38 reported violent offenses including rape, robbery, and assault in a three-year period, statistics of which Jeanne and her parents were never made aware (Gross & Fine, 1990). The Clerys subsequently devoted their lives to leading legislative efforts requiring institutions of higher education to be forthcoming about campus crime.

Signed into law in 1990 as an amendment to the Higher Education Act of 1965, the Student Right-to-Know and Campus Security Act of 1990 has seen numerous changes over the past thirty years. However, in that same time the purpose of the Clery Act has remained the same, to (a) provide prospective students and their parents campus crime information that may influence their decision regarding enrollment; (b) provide students and employees information about campus crime statistics to protect themselves; and (c) reduce crime (Gregory & Janosik, 2002; Janosik & Plummer, 2005; Sells, 2002).

Some of the biggest changes to the Act came in 1998 with the renaming of the act to the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Other changes in 1998 included increases in the categories of crimes, expanded campus geographic locations including the addition of residence halls, requirements around the maintenance of a public crime log, and other disclosures focused on providing data to students and employees through the ASR (McCallion, 2014). A second round of major changes came ten years later in 2008, through the Higher Education Opportunity Act.
These changes included requirements around bias related crimes, policies related to missing students, expectations on relationships with local law enforcement agencies and requirements regarding the disclosure of outcomes of conduct hearings with victims of certain crimes. Through the reauthorization of the Violence Against Women Act (VAWA) the most recent amendments to the Clery Act created additional crime categories and additional requirements to the ASR (McCallion, 2014).

The requirements set forth by the most recently amended version of the Clery Act are lengthy and detailed. For institutions receiving federal funding, the Act requires institutional financial commitments of staffing and time to ensure compliance. A broad overview of the top requirements are:

1. Collect statistics of specific crimes that occur within specific geographical areas of campus.

2. Maintain a publicly available crime log.

3. Publish and distribute an Annual Security Report (ASR) disclosing specific statistics and certain policies and procedures.

4. Distribute timely warnings that meet specific crime and geographic categories when the institution considers the crime as a continuing or ongoing threat to the campus community.

5. Distribute emergency notifications during situations that create an immediate threat to the campus community (U.S. Department of Education, 2016).

At the time of its implementation through today, some have argued the hope of the Clery Act was to educate students and others about risks related to their personal safety which
would hopefully influence students to make better choices and reduce their chances of being a victim of a crime. Others contended this type of legislation was never read, rarely resulted in changed behavior, and that money would have been better applied elsewhere (Janosik, 2001). Nearly 30 years after being signed into legislation, there continue to be questions on the effectiveness of the act and its requirements because no assessment of individual requirements, such as emergency notifications and timely warnings, have been conducted.

**Effectiveness**

In the early 2000’s, researchers Gregory, Janosik, and Gehring conducted several studies questioning the effectiveness of the Clery Act. These studies questioned if timely warnings, mandated educational programs, publishing crime statistics and lengthy ASRs informed college students or their parents, and if these influenced their decision-making process related to selecting an institution of higher education (Gregory & Janosik, 2002, 2003; Janosik, 2001, 2004; Janosik & Gehring, 2003). In the following years, Janosik collaborated on additional studies that questioned the Clery Act’s influence on campus law enforcement practices, on student behavior, on parents’ perceptions of campus safety, and the views of victim advocates.

Janosik (2001) led the efforts to start questioning the effectiveness of the Clery Act through a survey of students at three institutions. Janosik found mixed results regarding the impact of the Clery Act, noting that few students reported taking the information into account in their decision-making processes, but nearly fifty percent made use of educational information once on campus. This work was quickly followed
by Gregory and Janosik (2002), further questioning the effectiveness of the act and making recommendations for improvement including creating an “Office of Clery Act” compliance, ceasing the addition of new regulations or amendments for a minimum of three years to allow for the implementation of recommendations, and that research be conducted on the effectiveness of the Act (Gregory & Janosik, 2002).

The largest study conducted of college students specifically seeking to understand their awareness of the Clery Act was reported by Janosik and Gehring (2003). The study took Janosik’s (2001) work and implemented it on a national scale through the National Association of Student Personnel Administrators (NASPA), seeking to understand students’ awareness of the Act, if the students used information from the act in selecting their institution of higher education, and if students were using programmatic information they had received from their institution’s requirements. Janosik and Gehring (2003) found that just over one quarter of students surveyed were aware of the act’s existence and less than one quarter of students remembered receiving any information in their admissions materials. Of those who remembered receiving information, only eight percent shared the data influenced their decision-making process. Alternatively, 60% reported reading crime related information and nearly 30% attended educational activities required by the act (Janosik & Gehring, 2003).

Janosik’s (2004) study of parents of first year students yielded similar results. Approximately 25 percent of the parents reported an awareness of the act, but only 11 percent reported the information playing any role in their decision-making process. Five years later, Janosik and Gregory (2009) studied the perceptions of senior student affairs
administrators regarding the effectiveness of the Clery Act and their views of campus safety. The authors noted that, repetitive of their studies from the early 2000’s, this study also found respondents reporting that the Clery Act and its subsequent reporting mechanisms had little to no impact on reducing campus crime. In their conclusion, the authors challenged that rather than increasing the reporting requirements, individuals on college campuses would be better served spending their time developing services and programs to positively impact their campus communities (Janosik & Gregory, 2009).

Gregory and Janosik (2013) shared a review and synopsis of the literature published in the previous decade around the Clery Act, noting that little of substance had been published supporting the Act’s effectiveness. In this writing, the authors challenged how concern about campus safety among our larger society is developed by media and other watchdog groups. With a lack of formal research on the topic of campus safety, much of the information available comes from news stories, and the content most likely to make the news are high profile crimes that don't necessarily represent trends on college campuses. Additionally, this type of reporting can create unrealistic expectations about the safety of a college campus while failing to acknowledge that college campuses bring together people of diverse backgrounds and ideologies, ultimately nesting that community into the local community.

Early in their research, Gregory and Janosik (2003) challenged the expectations set forth through the Clery Act,

The emphasis on the campus crime reports should be lessened and a focus upon increasing campus safety programs, notification to students about safety hazards,
increased “timely notice” when a serious crime occurs, and increased cooperation between campus officials, students, the media, and others to change student behaviors must be the new focus. (pp. 777-778)

Gregory and Janosik’s questioning of the effectiveness of the Act came fifteen years after its’ passing. Now, 15 years after their questioning, there has still been no focused research efforts to evaluate the effectiveness of the Clery Act and its’ requirements. Specifically related to the Clery Act, it is noted that confusion continues to exist related to the definitions of specific terms, and even with attempts at standardized models for statistical counting, differences in definitions and interpretations continue to exist (Fisher & Cullen, 2013).

**Enforcement and Penalties**

The Department of Education is charged with enforcing the Clery Act and the past decade has presented several record-breaking investigations and subsequent findings of violations that come with steep financial penalties. According to Bauman (2018),

Between 2010 and 2017, the department imposed 40 fines on colleges for violations of the Clery Act’s campus-safety and drug-free campus regulations. Altogether, the department has assessed just over $5 million in fines against colleges with a nearly $2.4 million fine (the largest on record) levied against Pennsylvania State University in the aftermath of the Jerry Sandusky child-abuse scandal. The median fine over the course those seven fiscal years was $47,250. (p. 2)
Anyone can submit a Clery complaint which outlines how the individual believes their institution of higher education has violated the Clery Act. Although the process is administrative, not legal, as seen in several prominent cases, the audit process can take years.

In 2007, the U.S. Court of Appeals for the First Circuit supported the actions of Johnson & Wales University when they named a student and fraternity in a timely warning (Lipka, 2007b). Christopher Havlik, a member of Zeta Beta Tau fraternity, and several members of his fraternity confronted students who declined to join their organization, displayed a knife, and reports stated Mr. Havlik struck a nonmember in the head. Johnson & Wales drafted their timely warning, ran it past their legal counsel, and issued the notice to the campus of the concern for the campus community. This case was groundbreaking for college campuses in its demonstration of the court’s willingness to support an institution’s use of information that identifies a known suspect in alerts.

In 2008, Eastern Michigan University (EMU) was fined $350,000, which was then the highest charged penalty, for failing to follow the Clery Act. EMU failed to warn the campus community about the murder of a student, Laura Dickinson, in her on-campus residence hall during December, 2006. Laura Dickinson, in her first semester at Eastern Michigan, lived in a single room. An RA opened her door after being called by her father who had not spoken to Laura in two days. Later a lieutenant testified that her body was found on the floor of her residence hall room naked from the waist down with her legs spread and a pillow over her face. Police did not suspect foul play and subsequently did not issue a timely warning. When questioned as to why they did not issue a timely
warning, allegedly violating the Clery Act, the institution questioned how they were supposed to balance the warning requirement while maintaining a necessary level of confidentiality with regards to the investigation (Lipka, 2007a).

In 2016, the University of Iowa was scrutinized by its students for failing to send a “Hawk Alert” when a black University of Iowa student was attacked in a potential hate crime outside of an off-campus bar by three white students. The University of Iowa community found out about the incident through social media when the attacked student’s story was broadcast in his Chicago hometown news. The University apologized, promised to review its policies, and acknowledged the gap in communication when the student attempted to report the incident to University of Iowa police, but was referred to Iowa City police to report his account of the incident, since it occurred off campus, following Clery geography (Zamudio-Suarez, 2016).

In the fall of 2019, the University of North Carolina – Chapel Hill (UNC), received results from two complaints filed with the Department of Education in 2013, regarding crime and safety issues on campus from 2009 through 2013. UNC spent over six years participating in a Department of Education investigation alleging the institution failed to meet the requirements set for in the Clery Act through its policies, procedures, programs, and reporting of its’ crime statistics (U.S. Department of Education, 2019). The report resulted in nine findings, of most relevance:

1. UNC failed to develop and implement the requirements of the Clery Act through a lack of administrative capacity, specifically the institution did not employ an appropriate number of qualified staff to sufficiently operate the system.
2. UNC failed to properly develop a map outlining on-campus property, non-campus property, and public property constituting Clery geography.

3. UNC failed to issue timely warnings to students and employees of serious threats to personal safety.

4. UNC failed to properly gather and disclose their crime statistics.

5. Discrepancies were found between the crime statistics the university included in their ASR and what was submitted to the Department of Education (U.S. Department of Education, 2019).

Throughout the time of the investigation the institution invested in additional personal, campus wide training programs and, made departmental and personnel changes, among a series of other corrections to institutional practices, and is still awaiting a final result regarding fine costs (U.S. Department of Education, 2019).

These examples highlight some of the detailed processes individuals, including Clery Compliance Officers, campus security agencies, campus police departments and Campus Security Authorities (CSAs), are involved with in utilizing campus policy and procedures to interpret the sometimes vague and other times highlight detailed instructions set forth through Clery. Instances like the example from Eastern Michigan University demonstrate where one individual can incorrectly interpret those directions causing havoc for an institution. In other instances, the geographical location of an incident dictated institutional response rather than what could be best for the campus community. These instances raise the question as to whether the detailed processes,
lengthy investigations and large fines are actually resulting in meeting any of the three intended outcomes originally set forth in the passing of this legislation.

**Title IX**

Reporting requirements exist under both the Clery Act and Title IX. Title IX is a federal law supporting equal opportunity, specifically providing that no person can be discriminated against on the basis of their sex in an educational program or activity receiving federal funding (White House Task Force to Protect Students from Sexual Assault, 2014). Under Title IX, institutions of higher education must respond to such instances, including sexual violence, when a responsible employee knows about the behavior. Similar to the Clery Act, Title IX has parameters around locations or activities when the school must respond to incidents of sex discrimination and also identifies individuals with reporting responsibilities. Different than the Clery Act, Title IX does not prescribe or set forth expectations related to timely warnings or other emergency communication to the campus community. Best practice, presented by the Clery Center for Security on Campus (2016), encourages collaboration between the individual(s) responsible for Clery coordination and subsequently the issuance of timely warnings and the Title IX coordinator.

**Clery Compliance Officers**

Although the Clery Act has been in place since 1990, the creation of a national organization professional to support individuals with responsibility for Clery reporting is relatively new. The National Association of Clery Compliance Officers and Professionals (NACCOP) was established in 2013 to create opportunities for engagement and
collaboration for colleges and universities in their work to comply with the Clery Act.

NACCOP is supported by the International Association of Campus Law Enforcement Administrators (IACLEA), a 60-year-old professional association for individuals committed to campus public safety. While the Clery Act sets forth expectations related to reporting that must be completed, there are no written expectations for the role that individual plays on campus, expectations of a position description, nor training or educational experiences.

Crisis Communication

In the United States, the field of crisis management is relatively young, stemming from the late 1980’s. Early research in the field focused on the reactions and next steps taken by larger corporations. One of the founding examples of crisis communication comes from Johnson & Johnson who in 1982 found itself in crisis as a result of poisonings from bottles without tamper-proof lids. The company’s handling of the crisis, including taking responsibility and apologizing, continues to serve as a foundational example in the field of crisis management (Crandall et al., 2014).

Crisis

As institutions of higher education face crises such as student-initiated shootings like Virginia Tech and NIU or balance the demands of natural disasters such as Hurricane Katrina’s impact on Louisiana, an increased importance has been placed on defining crisis and how to communicate during such times (Booker, 2014). Crandall et al. (2014) define a crisis as,
an event that has a low probability of occurring, but should it occur, can have a vastly negative impact on the organization. The cause of the crisis, as well as the means to resolve it, may not be readily clear; nonetheless, its resolution should be approached as quickly as possible. Finally, the crisis impact may not be initially obvious to all of the relevant stakeholders of the organization. (p. 5)

No one, no business or individual, is immune to the possibility of a crisis and the impact it will have on their personal and work lives. A crisis is not simply a bad experience, it is a critical instance with the elements of surprise, threat, and a short response time. Crises are different than emergencies, which are typically small scale, more controlled, easily resolved and create less of a long-term threat. Crises are unexpected, non-routine, produce uncertainty, create future opportunities, and are a threat to image, reputation and high-priority goals. While crises are inherently seen as negative, a crisis can lead to positive outcomes. It is how an organization or individual communicates following a crisis heavily influences if there will be a positive or negative outcome (Ulmer et al., 2017).

**Communication**

Crises expose an institution or organization’s character. The midst of a crisis should not be seen as the time to try and build character. Crises are not the opportunity to use a planned or scripted messaging. A crisis is an opportunity to listen, pay attention, and then craft a message that meets the needs of the stakeholders. Prior to a crisis, successful organizations will have engaged in needs assessment work with their constituents to understand how to best communicate during a time of crisis, including
understanding messaging specifics and preferred channels of communication. This enables institutions to respond authentically to the unique needs of their specific stakeholders during times of crisis (Ulmer et al., 2017).

Messages sent by organizations to stakeholders after a crisis tell stakeholders what to do to protect themselves and help them cope psychologically with the crisis. Messages communicating each of these pieces must be carried out in an expedient manner (Crandall et al., 2014). These messages support the organization in maintaining the loyalty of customers through truth telling, responding to customer concerns, and providing customers with the necessary information during a crisis. Facts need to be properly explained to customers so they will continue their relationship with the company, credibility will be questioned otherwise. Organizations with previously established strong stakeholder relationships are more likely to come out of a crisis successfully (Ulmer et al., 2017).

According to Nelson (2004), crisis communication has several important functions that must be carried out in an increasingly small period of time. First, it must convey what has happened and what plans are in place to address the crisis. Second, communicated messages should satisfy the unique requirements of the specific audience or stakeholders. The tone and context of all messages is important and should remain consistent.

While instruction is a key component of crisis communication, without confidence in ones’ ability to learn and follow instructions, an individual remains in a high-risk situation without tools to remove themselves. Warning messages should
provide protective guidance that are personalized to increase the chances an individual will follow the guidance given.

**Emergency Communication within the Clery Act**

The Clery Act requires Title IV funded institutions to have emergency plans that are tested, evaluated, and publicized, noting it is important that institutions follow what is outlined in their policies related to emergency communication. Two types of emergency communication are required, (1) emergency notifications, in response to immediate threats such as a fire, hurricane, terrorist incident, or armed intruder, and (2) timely warnings, to alert the campus of a potentially dangerous situation in the hopes of preventing a similar crime (U.S. Department of Education, 2016).

Timely warnings must be issued for all Clery Act crimes that occur within a campus’ Clery Act geography, are reported to the authorities, and are subsequently considered by the institution as a serious threat or continuing threat to the community (U.S. Department of Education, 2016). This determination is made by an individual identified in advance and noted in the Annual Security report required by the Clery Act. Due to the nature of timely warnings, the Clery Act requires that the method of distribution for the timely warning reaches the entire campus. In making the decision to issue a timely warning, per the Handbook, decisions should be made on a case-by-case basis taking into account all of the information available including (1) the nature of the crime, (2) the possibility of continuing danger to the campus, and (3) the potential impact on law enforcement efforts related to the original crime.
Emergency notifications, different than a timely warning, are a result of a broader range of potential threats to the campus community. These are not necessarily a reportable crime as emergency notifications are sent for weather emergencies, health related emergencies, and other crises that may impact the safety of campus (i.e., a gas leak) (Carter, 2013). There are certain instances when a crisis could fit both the criteria for a timely warning and an emergency notification. Emergency notifications, because they may be directed towards a select location or population of individuals, can be communicated to a specific group of people.

While prescriptive regarding when communication must be sent, the Clery Handbook does not provide specific information on the content or format of a timely warning. It is the responsibility of the institution to determine the content and communicated mediums used to ensure the communication is likely to reach the entire campus community. Institutions are instructed to create institutional policy that specifies what types of information are included and who the individual or individuals responsible are with responsibility for communication issuances (U.S. Department of Education, 2016).

In 2008, proposed legislation associated with the renewal of the Higher Education Act would have required institutions to notify their campus community within 30 minutes of a significant emergency or dangerous situation. This effort was lobbied by Security on Campus, the group created by the Clerys’ (Lipka, 2008). This would not have impacted the timely warning as defined at that time but created a new obligation in case of a crisis. Security on Campus argued that campuses were slow in responses and communication to
their community. Of particular importance in the arguments for the proposed legislation was the recognition of ever evolving expectations of students and their parents related to instant communication. Opponents of the legislation focused on logistical questions such as at what time does the 30-minute clock start or what happens at the conclusion of that 30 minutes? The legislation was not passed (Lipka, 2008).

The Clery Act and its requirements related to emergency communication fails to acknowledge the psychological impact of such messaging. New technologies could incorporate such findings and result in the establishment of systems tailored to the individual recipient. Just as not all emergencies are created equal, each recipient of a timely warning is likely to have a different response influenced by their individual characteristics. As researchers began to seek understanding of people’s responses to disaster warnings, they quickly realized they were in fact working with a complex social process and not individual reactions (Drabek, 1999). Since people are typically with someone else, groups are processing disaster warnings, not individuals. This can result in conversation, debate, or arguments about what should be done next (Drabek, 1999).

The process in which individuals form perceptions is ongoing throughout their life. Perceptions are formed throughout an individual's life whether the result of a social event, a family interaction, or an emergency. As an individual encounters any situation, they engage in active problem solving with the information presented to them, but that problem solving process is influenced by the individual’s beliefs and previous personal/past experiences, as well as identity/societal influences such as religious, educational, race, sexuality, cognitive, etc. (Mileti & Peek, 2000).
Communication Methods

Early warning mechanisms during times of crisis included methods such as face-to-face communication, sirens, radio, television, telephones, and newspapers. Early methods of emergency communication had issues with the time it took to distribute the message, the clearness of the message being delivered and the cost to distribute. The emergence of social media has created alternate avenues for sharing information following a crisis where traditional methods (television, radio, landline phone) ran the risk of being lost following a disaster. One challenge with the use of social media, similar to the early use of the telephone, is that the message can be distorted, interpreted differently, and can be quickly distributed beyond the initiator's control (Mileti & Peek, 2000).

A recent study by Williams et al. (2017) analyzed the tweets of Boston Mayor Thomas Menino following the Boston Marathon Bombing. The authors compared the tweets utilizing a restorative rhetoric lens finding the use of strategic and humanistic communication supported the restoration of public safety while demonstrating leadership through crisis.

Theoretical Perspectives

Theory, according to Sellnow and Seeger (2013), organizes the observations of a phenomenon or sets of related phenomena; describe what is observed; explain the relationships between constructs; predict what will happen in a particular circumstance; control the outcome when it is possible to predict; inform practice by helping people understand what is
happening; facilitate critique by promoting understanding of what can happen; promote inquiry and research by helping investigators form questions; and promote other theory building by providing related insights. (p. 16)

Timely warnings are issued on a college campus as a reaction to an incident that occurred and are simultaneously proactive communication intended to decrease the likelihood of a similar incident. Given the instructions set forth by the Clery Act related to policy development, it is appropriate for institutions of higher education to create processes and protocols for the issuance of a timely warning (U.S. Department of Education, 2016), yet crisis communication theory encourages the use of communication that is crafted for a specific incident. When a timely warning is issued, each individual within a college’s student body is given the opportunity to individualize the message based on their individual lived experiences, including their next best steps for personal safety. For the individuals crafting and releasing a timely warning, finding a balance in meeting all of the necessary criteria while balancing the needs of the receiver can best be done with the support of theoretical perspectives stemming from the field of crisis communication.

Three crisis communication theoretical perspectives were reviewed to determine the most appropriate perspective to apply to this study.

**Risk Communication.** Risk communication is a proactive process through which an entity responsible for risk proactively and interactively engages in communication with the individuals at risk. This type of proactive communication allows the individuals “at risk” to determine if they perceive themselves as at risk or if they are willing to accept the risk because of a potential benefit (Ulmer et al., 2017). An example of this type of
communication might be when a new manufacturing entity is interested in relocating to a town. The company will likely proactively communicate their interest to see what reaction community members have. Community members may have concerns with increased traffic and environmental impact but may also see the positives to the local economy. Risk communication is noticeably different from crisis communication, but poor risk communication can lead to a crisis. Risk communication is proactive, future oriented, designed to avert crises, and speculates about what might happen in the future (Ulmer et al., 2017).

Renewal. Renewal is defined as “a fresh sense of purpose and direction an organization or system discovers after it emerges from a crisis” (Ulmer et al., 2017, p. 184), creating the opportunity following most crises for an organization to grow and learn. As a part of this definition there are four theoretical objectives, (1) organizational learning, (2) ethical and value-based communication, (3) a prospective rather than retrospective vision, and (4) organizational rhetoric that is engaging and effective. This approach demonstrates an organization’s ethics and values while simultaneously showing the desire to learn and then appropriately move forward. In order to use the opportunity of renewal effectively, organizations must first demonstrate an interest in learning (Ulmer et al., 2017). Communicating what the organization has learned through the crisis demonstrates to stakeholders that the opportunity for learning and subsequent change has not been lost and can rebuild confidence. This is also an organization’s opportunity to reinforce mission and value statements. Creating and maintaining positive stakeholder relationships prior to crises support an organization’s movement past a crisis. Ethical and
provisional communication supports renewal. Communication that is open, honest, and takes responsibilities builds upon the trustworthiness of an organization. Provisional communication demonstrates an awareness of current conditions, is focused on how the organization learns and then wants to move forward. Organizations frequently choose strategic communication, rather than provisional communication, during times of crisis, because strategic communication focuses on protecting the reputation of the organization in question.

**Hear-confirm-understand-decide-respond model.** Warnings are not a simple stimulus; they instead initiate a complex social process. Mileti and Sorensen (1990) established the “Hear-Confirm-Understand-Decide-Respond” model, geared towards risk communication focused on public warnings (as cited in Sellnow & Seeger, 2013). In this process a message is created by the sender, received by the receiver, to which the receiver then interprets and responds to the message.

Mileti and Peek (2000) established that public warning systems engage in the use of this “hear-confirm-understand-decide-respond” model. Public warning systems include a detection subsystem, a management subsystem, and a public response subsystem. The detection subsystem detects risk in ways that CSA’s may do so across college campuses, subsequently reporting risks or incidents to a university police or public safety department. The management subsystem engages in decision-making processes to balance the pros and cons for issuing a warning. On a college campus, the individual(s) with responsibility for the issuance of a timely warning would engage in a similar process balancing the expectations set forth through the Clery Act and the Department of
Education Handbook, with the information available at that time, and the community impact (Mileti & Peek, 2000).

In their research Mileti and Sorensen (1990) identified 11 communication factors: electronic channel, media, siren, personal versus impersonal message, message specificity, number of channels, frequency, message consistency, message certainty, source credibility, and source familiarity that could impact the individual’s behavioral response in the use of the “hear-confirm-understand-decide-respond” model. Previous applications of this theoretical model have investigated the response of the specifically targeted public audience to better understand the response. Lessons learned have included that the status of the individual issuing the warning impacts individual response, perceived credibility of the individual issuing the warning impacts individual response, and that delivery source is ever changing and the location of the individual when they receive their warning greatly impacts their response (Sellnow & Seeger, 2013).
CHAPTER 3
RESEARCH METHODS

The purpose of this study was to explore the training experiences and educational backgrounds of individuals at regional comprehensive institutions of higher education in the Midwest with student populations between 5,000 and 10,000 who have responsibility for issuing a timely warning as prescribed by the Clery Act. These individuals frequently serve as chiefs of police, directors of public safety, and/or Clery compliance officers with institutional responsibility directly related to Clery compliance and the annual submission of the ASR.

In order to understand the experiences and educational backgrounds of these individuals, specifically seeking to explore their use of crisis communication in the issuance of such messages, semi-structured interviews coupled with a document analysis of a previously issued timely warning were selected.

This study explored three research questions:

1. How do the individuals with responsibility for issuing timely warnings describe their training and education related to crisis communication?
2. What role does collaboration with campus partners play in crafting timely warning messages?
3. How is crisis communication used in the messaging of timely warnings?

Methodology

Qualitative research, in general, allows the researcher to study the complexities of a particular phenomenon that occurs in our natural, day-to-day lives, identifying the many
dimensions and layers that are a part of that phenomenon (Leedy & Ormrod, 2016). Furthermore, when little research exists on a topic, a qualitative study allows the researcher the opportunity to find and define relevant information otherwise unidentified (Leedy & Ormrod, 2016). Leedy and Ormrod (2016) further share that qualitative studies typically serve one or more of six purposes: exploration, multifaceted description, verification, theory development, problem identification, and/or evaluation. This study sought to explore – gaining insights on a little-studied topic, problem identification – seeking to uncover obstacles that exist with the phenomenon, and evaluation – creating an opportunity to judge the effectiveness of a specific practice.

Previous research on the Clery Act, conducted over the past twenty years primarily questioned if the Clery Act was meeting its three intended purposes. Minimal research has focused on the experiences of individuals implementing the act, and no discovered research has focused on the intersection of meeting the Acts requirements in the issuance of a timely warning and the use of crisis communication. In order to start comprehending these experiences, a qualitative approach that allowed for seeking understanding was important in the selection of an appropriate methodology. Subsequently, qualitative descriptive research was selected, supported by conducting semi-structured interviews and a document analysis. Qualitative description is defined by Kim et al. (2017) as,

…important and appropriate for research questions focused on discovering the who, what, and where of events or experiences and on gaining insights from informants regarding a poorly understood phenomenon. Qualitative description is
a suitable goal when a straight description of a phenomenon is desired or information is sought to develop and refine questionnaires or interventions. (p. 23)

Semi-Structured Interviews

This study employed semi-structured interviews. Semi-structured interviews are described by Leedy and Ormrod (2016) as interviews in which the researcher asked standard questions with individually tailored questions utilized to clarify the individual’s response. This research method allows for the researcher to develop rapport with participants, likely resulting in a high response rate. Alternatively, this is also a time-consuming process making it difficult to use with a large sample size (Leedy & Ormrod, 2016).

Content Analysis

A content analysis, as defined by Leedy and Ormrod (2016), is “a detailed and systematic examination of the contents of a particular body of material for the purpose of identifying patterns, themes, or biases” (p. 257). A subset of a content analysis, document analysis, involves the same systematic review, but narrows the type of content to documentation such as books, newspapers, and press releases, while eliminating other content like film, television or art (Bowen, 2009; Leedy & Ormrod, 2016). Bowen (2009) elaborates that document analysis, as a form of research, is frequently used with other qualitative research methods to help corroborate information gained through the use of different data sources. Document analysis as a research method is efficient, cost-effective, and stable. Documents collected, specifically a published timely warning
message by each institution, went through an analysis seeking emerging themes related to the use of crisis communication.

**Participant Selection**

According to the U.S. News & World Report there were over 4,000 postsecondary institutions in the 2017-2018 academic year (Moody, 2019). In seeking to better understand the individualized experiences of individuals with responsibility related to the issuance of a timely warning and given the lack of other available research on the topic, selecting a small sample created the opportunity to seek further insights and understand the practice. For this study, the individuals included a subset of the individuals with responsibility for issuing a timely warning under the Clery Act. In all instances these individuals maintained full-time positions such as Chiefs of Police, Directors of Public Safety, or Directors of Safety. Purposeful sampling, selected for this study, allowed the researcher to select the individuals that were informative about the topic and subsequently were able to provide the best information to answer the research questions being asked (McMillan, 2004).

The U.S. News and World Report Best Colleges for 2020 (U.S. News and World Report, 2020) website allows users to select certain rankings and lists, including a list of regional universities. According to the website, regional universities offer some masters and doctoral programs but focus their work on undergraduate education. The website allows for regional rankings to be split into the four geographical regions of North, South, Midwest, and West. Selecting the geographical region “Midwest” results in 88 individual institutions with enrollments varying up to 14,000, and tuition and fees ranging from
$5,000 to $50,000. To find individual institutions with similar resources including staffing patterns and access to financial support for training, student enrollments of 5,000 – 10,000 was selected resulting in a list of 25 institutions.

Individual participants were recruited through direct outreach by the researcher. Working professionally within the region would hopefully provide some familiarity with the institution from which the researcher is coming. Outreach was sent at the beginning of June 2020 via email.

**Procedures**

This study was approved by the Institutional Review Board at the University of Northern Iowa on June 9, 2020 as documented in Appendix A. Participants were contacted via email using the template provided in Appendix B. Prior to participating in the interview, participants responded to the informed consent (Appendix C) via email, documenting their desire to move forward in the process.

**Data Collection**

Interviews were conducted between June and September 2020. Interviews were conducted over the phone following the Interview Guide (Appendix D). Participants were asked to provide an electronic copy of a timely warning related to an incident of alleged non-consensual sexual misconduct in the initial outreach email and were reminded at the conclusion of their interview.

**Data Analysis**

Through MAXQDA, transcripts were coded to identify patterns, similarities, and major differences in the training and education experiences of the subjects related to the
use of crisis communication. This same approach was used to understand the use of campus partners in the crafting of such messages including seeking patterns in identified partners.

The content analysis of the issued timely warnings included a comparison to six of the 11 identified communication factors from Mileti and Sorensen (1990) specifically: media, personal versus impersonal message, message specificity, message consistency, message certainty, and source credibility to determine if the crisis communication theory of hear-confirm-understand-decide-respond was utilized.

**Ethical Considerations and IRB**

This researcher completed the University of Northern Iowa Subjects review training. Following completion of the training and prior to the collection of data, the University of Northern Iowa Human Subjects Review Committee approved the research instrument and protocol (Appendix A).

**Anticipated Results**

It was anticipated that each participant would have some form of national training related to compliance with the Clery Act and subsequently engaged in proactive measures within their campus community to establish basic timely warning templates. It was further anticipated that most individuals would not self-identify as having formal education or training experience related to crisis communication, nor would the researcher find relevant experiences in their training or education.

Related to the content analysis, it was anticipated that each participant would work with a university relations department and/or outside consultant in the crafting of a
timely warning template but would not actively work with a university relations department and/or outside consultant at the moment of decision making to distribute a timely warning. Thus, exemplifying the limited use of crisis communication theory or practice in the issuance of such messaging.
CHAPTER 4

RESULTS

Through semi-structured interviews and a content analysis, this qualitative study explored the use of crisis communication theory in the issuance of timely warnings. Analysis of the eight participant interviews was completed using a data software program. From that analysis eight themes emerged, which were subsequently further analyzed seeking subthemes. A content analysis of the four submitted timely warnings allowed the researcher to seek instances of the use of communication factors and the use of the crisis communication theory of hear-confirm-understand-decide-respond.

Data Collection

Data was collected through semi-structured interviews and documents submitted by participants. Each interview was recorded and transcribed. Interviews were transcribed via artificial intelligence (Ai) through Rev.com with 80% accuracy. The transcriptions of the interviews were imported into MAXQDA software. Once in MAXQDA, the transcripts were reviewed a final time by the researcher with the use of the audio recording to manually increase the accuracy of the transcripts. At this time each participant was randomly assigned a name based on a letter of the Greek alphabet (Alpha, Beta, Theta, Delta, Epsilon, Iota, Gamma, Omega).

Participant Characteristics

Twenty-five individuals from the Midwest region, as defined by the U.S. News and World Report (2020), were solicited via email for participation in this study. Eight individuals responded and were interviewed due to their positional responsibilities related
to their campus’ compliance with the Clery Act. All participants consented to participate in the study, including the semi-structured interview and sharing documentation. Personal and professional demographic information collected included, (1) gender identity, (2) racial identity, (3) highest level of degree obtained, (4) number of years employed in their current position, and (5) number of years of experience working with the Clery Act. A summary of the collected demographic information and work history of the participants, sorted by highest level of education obtained, can be found in Table 1.

Table 1. *Participant Characteristics*

<table>
<thead>
<tr>
<th>Gender Identity</th>
<th>Race</th>
<th>Highest Level of Education</th>
<th>Time in Current Role</th>
<th>Years Experience with Clery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>Black</td>
<td>Doctorate degree</td>
<td>20 years</td>
<td>25 years</td>
</tr>
<tr>
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<td>White</td>
<td>Master’s degree</td>
<td>10 years</td>
<td>6 years</td>
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<td>7 years</td>
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<td>White</td>
<td>Master’s degree</td>
<td>5 years</td>
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<td>11 years</td>
</tr>
<tr>
<td>Male</td>
<td>White</td>
<td>Bachelor’s degree</td>
<td>2 years</td>
<td>2 years</td>
</tr>
</tbody>
</table>
Data Analysis

Utilizing MAXQDA, a six-step interview analysis was conducted: (1) preparing, organizing, and exploring the collected data, (2) developing categories for analysis, (3) basic coding, (4) developing the category system further and fine coding, (5) analysis of the coded data including comparisons, (6) engaging in the process of writing the research report (Rädiker & Kuckartz, 2020).

A document analysis of the notifications provided by four of the eight participants was conducted. A scoring rubric from Mileti and Sorensen (1990) previously used to compare the most important message content for natural disasters was adapted to score the six communication factors and the use of hear-confirm-understand-decide-respond.

Themes

In steps one and two of the analysis process, four interviews were randomly selected for a cursory review by the researcher. A broad list of themes was developed through this cursory read. All eight interviews were then read, and seven separate codes (in no particular order) emerged, (1) work history, (2) methods of communication during crisis, (3) training and education related to the Clery Act, (4) training and education related to crisis communication, (5) campus partners’ collaboration, (6) challenges of the Clery Act, and (7) quotable passages. All interviews were read two additional times and coded through MAXQDA as a part of the analysis process. In steps three and four of the analysis process, individual codes were further broken down into subcategories in the exploration of information related to the specific research questions.
Work History

The eight participants shared various work experiences that brought them into campus police work. Five participants started their careers in some form of local law enforcement, typically as a city police officer. As they transitioned to college or university police work, they typically advanced their careers by stepping into a lieutenant, sergeant, or chief position. Only three of the participants had spent their entire career as a college or university police officer working their way through the ranks at one or more institutions. As off-campus law enforcement does not have a responsibility for compliance with the Clery Act, it is interesting to consider the educational process in which an individual 10 or more years into their career (two participants had more than 25 years of work as law enforcement/police officer off-campus before transferring to a leadership position at a college) would need to engage in order to learn and understand the nuanced work for Clery Act reporting.

Gamma was the only participant with responsibilities beyond that of a Chief of Police or Public Safety Director. While Gamma is “a police officer by training with over 28 years of experience as a police officer,” their interim work with human resources and diversity and inclusion, in addition to earning their doctorate, has resulted in an elevated position with broader campus responsibilities.

Several of the participants described careers that advanced through multiple agencies (sheriff, police, college or university officer) but stayed within the same geographical region. They shared established relationships among agencies that helped them access the opportunity to transition to work on the college or university campus, but
also described benefit in seeking information related to Clery Act compliance from these relationships.

Methods of Communication during Crisis

Participants were asked information about how their campus communicates with the campus community, specifically students, during times of crisis. All eight participants shared that their institutions utilize email, although several participants expressed concern that students do not actually check or thoroughly read information shared through email communication by the university. All but one institution described their policies and procedures as instructing the use of text messaging for the issuance of a timely warning. There was general sentiment that the use of a text message could initiate interest or engagement of students and serve as a tool to connect students with additional information on the web or available through an email. Other forms of communication included websites, postings, and flyers.

The use of social media to share a timely warning was only discussed by two participants who both spoke highly of using social media. Alpha stated, “I think I have a pretty good relationship with at least the students and even the community for that matter on social media.” Other participants expressed reluctance using social media in general and in relation to times of crisis, expressing concerns with the burden of taking on an additional responsibility that would have to be maintained without additional resources. This was surprising given the successful use of social media in more recent incidents such as the 2016 knife attack on the Ohio State University campus resulting in the tweet, “Buckeye Alert: Active Shooter on campus. Run Hide Fight. Watts Hall. 19th and
Three participants discussed their campus successes using software programs including Campus Shield 911 and RAVE, alert system programs institutions can purchase to manage emergency notification processes. They described the implementation and use of these programs as “quick” and “easy” both in their implementation across campus and activating during an emergency. These products mirror the national Emergency Alert system, providing campuses quick access to multiple forms of communication with their target audience.

Training and Education: Clery Act and Crisis Communication

Interviews were structured to ask participants to describe their knowledge of the Clery Act and then how they gained that knowledge in the first half of the interview. The interview was transitioned with a statement by the interviewer about changing focus to timely warnings and crisis communication approximately halfway through the interview. The last scripted interview question asked was focused on training received or experiences related to the use of crisis communication techniques or theories. This set up of questions was intentional, creating separation in the descriptions of the two types of training. Although separate questions were asked about separate types of training there were overlaps in the answers by all participants.

Regarding Clery Act related training, participants described acquiring their knowledge through a wide variety of experiences including attending specific sessions as a part of conferences, participating in webinars, utilizing other professionals, and other experiences. All participants mentioned accessing, thoroughly reading and then
referencing the Clery Act Handbook. Three participants mentioned training provided by national agencies Hursch Blackwell or Delores Stafford. The go to resource for questions related to the Clery Act was submitting a question to the Department of Education. Although participants accounted for numerous educational experiences and described both ongoing and yearly trainings, when asked how they would describe their knowledge of the Clery Act, only one participant, Theta, provided an answer that reflected confidence by stating, “I think I have a really good grasp of the Clery Act.” Other participants used various scales to describe their knowledge sets, Gamma gave themselves a ranking of “7” on a 1-10 scale, Epsilon described their knowledge as “average,” and Omega gave themselves a “C” on an A through F grade scale.

Regarding crisis communication related training, participants described their knowledge similarly to how they gained their Clery Act knowledge. Again, conferences, webinars, seeking best practices from other institutions, were all mentioned, as were trainings provided by Hursch Blackwell and Delores Stafford. During this time Iota commented, “It’s not always about the perfect message or content. It’s about timing. It’s about safety within our community. It’s about notifying our community and getting that message out.” Participants did not describe trainings either by topic or experience that were different than the training described for compliance with the Clery Act.

**Campus Partners’ Collaboration**

The second half of interviews focused on the processes for issuing a timely warning. In response to these questions, participants shared information on the individuals they engaged with in the process of sending a timely warning and the role
those individuals took. Each participant described one or more individuals with positional authority that policy or procedure dictated they communicate with in the issuance of emergency communication. Examples of the positions included Vice Presidents for Administration, Chief Financial Officers, Chancellors, Provosts, Presidents, Deans of Students, and Title IX officers. Their responses were presented as a check box, a must, not an opportunity for engagement or to potentially better the information being sent to the campus community.

Second, questions asked at this point in the interview sought to understand who utilized a connection with a member of a University Relations department or other individual with media and/or communication responsibilities during this process. These are typically the individuals in a campus setting who have experience utilizing crisis communication theory or techniques.

Participants expressed a desire for the language in such communications to be understood, but in the same breath did not want assistance with content editing. For example, when asked if their university relations (or equivalent) department did any content editing or clarifying, Theta responded,

No. Typically when I send it to them, my standard verbiage is please send this out to all faculty, staff and students as written, because I don't want them wordsmithing something to the point where it's not in compliance because they don't know what it, what the wording should be.

Delta described their process similarly,
They are just proofing, you know, they are editors. I like to run things by them to get a second set of eyes on it, to make sure that how the message sounds, that it’s received properly. You know, I see it one way from a law enforcement perspective and they see it, uh, you know, they hear it differently than I do. So I like to get a different, different perspective on it to make sure that our messages are concise and clear.

Theta’s response reinforces the idea that parts of Clery Act compliance are left to feel like a check box, rather than an opportunity to potentially do what is best for the community. Delta’s response further supports this, noting but not giving credit to the different perception that a university relations (or equivalent) department may contribute to these issuances.

Challenges of Clery

Participants were initially hesitant to speak freely about what they would change in the Clery Act, but after being reminded they would remain anonymous through this process, opened up to share their frustrations and challenges in meeting the requirements set forth. Key phrases or words used to describe frustrations and challenges are outlined in Table 2. Participants expressed a supportive understanding of why Clery exists and its original purpose, but a desire to simplify today’s processes so they could best serve their communities.
Table 2. Participant key phrases describing challenges of working with Clery.

<table>
<thead>
<tr>
<th>Name</th>
<th>Key Phrase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beta</td>
<td>Bureaucratic, overwhelming</td>
</tr>
<tr>
<td>Theta</td>
<td>Contradictory, time consuming, bogged down</td>
</tr>
<tr>
<td>Delta</td>
<td>Simplify</td>
</tr>
<tr>
<td>Epsilon</td>
<td>Vague, gray</td>
</tr>
<tr>
<td>Iota</td>
<td>Bogged down, too complex</td>
</tr>
<tr>
<td>Gamma</td>
<td>No win</td>
</tr>
</tbody>
</table>

A sentiment that the evolution of the Clery Act had created a process simply too large was present through comments like Omega saying:

'It's like so many other ideas, we just kept trying to add to it to make it better or more encompassing. And I think we've, we've kind of morphed it into something that it's, it's, it's really not meant to be.'

Participants expressed frustrations with sweeping new guidelines or directions as a result of one singular institution's mistakes. Continuous changes only add to the huge effort that is Clery Act compliance, and simultaneously an effort that doesn’t automatically come with institutional resources (finances, people power, etc.) to support the effort. At the same time, with increasing fines for mistakes, pressure continues to be added that all aspects of compliance are done correctly.

Reflective of their individual care for their campus community, Delta responded, '[The] true intention is to make sure students and parents, prospective students are knowledgeable about the crimes that occur on and around campus. That’s what’s most important, but [with] all of the other items you put in there, I think it gets lost. People just are not going to read that. So I think it could be a lot more simplified.'
Iota shared similar sentiment regarding the need to protect their campus community while expressing frustrations with the outcome,

It's so, so compliance driven that I think we lose sight of what the actual spirit of the law is and which is, um, basically transparent consumer protection and putting policies and procedures in place that actually make our campuses safer.

Content Analysis

Mileti and Sorensen (1990) authored “Communication of Emergency Public Warnings: A Social Science Perspective and State-of the Art Assessment.” As a part of this study, the authors created a rubric (Figure 1) to compare what they defined as the five most important topics (hazard, location, guidance, time, and sources) in the content of public warning messages for natural disasters.

Figure 1. Mileti & Sorensen Rubric

<table>
<thead>
<tr>
<th>MESSAGE STYLE</th>
<th>MESSAGE CONTENT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>HAZARD</td>
</tr>
<tr>
<td>SPECIFICITY</td>
<td></td>
</tr>
<tr>
<td>CONSISTENCY</td>
<td></td>
</tr>
<tr>
<td>ACCURACY</td>
<td></td>
</tr>
<tr>
<td>CERTAINTY</td>
<td></td>
</tr>
<tr>
<td>CLARITY</td>
<td></td>
</tr>
</tbody>
</table>
Mileti and Sorensen’s original rubric was adapted for the use of this study to compare six of the 11 communication factors Mileti and Sorensen (1990) identified to determine if the crisis communication theory of hear-confirm-understand-decide-respond was utilized and actualized in the four collected timely warnings.

All eight participants were asked to submit a timely warning previously distributed to their campus community for allegations of non-consensual sexual misconduct. Four participants, following their interviews, provided the researcher with the requested documentation. Two participants, when requested at the end of their interview, stated they did not have a timely warning sent in response to an allegation of non-consensual sexual misconduct, so would not be able to further assist. Two participants, although they initially expressed a willingness to submit a timely warning following the interview, did not follow through with the request. The four timely warnings collected were analyzed using a rubric adapted from Mileti and Sorensen (Figure 2).
Figure 2. *Adapted Rubric*

<table>
<thead>
<tr>
<th>Communication Factors</th>
<th>Message Action</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hear</td>
</tr>
<tr>
<td><strong>Media</strong></td>
<td></td>
</tr>
<tr>
<td>Is the message from an individual or office? What authority is vested with that office or individual?</td>
<td></td>
</tr>
<tr>
<td><strong>Personal vs. Impersonal Message</strong></td>
<td></td>
</tr>
<tr>
<td>Is the content of the message personalized through the language used?</td>
<td></td>
</tr>
<tr>
<td><strong>Message Specificity</strong></td>
<td></td>
</tr>
<tr>
<td>Does the message contain specific information that would provide the reader with the necessary information to take a next step?</td>
<td></td>
</tr>
<tr>
<td><strong>Message Consistency</strong></td>
<td></td>
</tr>
<tr>
<td>Is the tone or language used consistent?</td>
<td></td>
</tr>
<tr>
<td><strong>Message Certainty</strong></td>
<td></td>
</tr>
<tr>
<td>Does the message use language that is firm or confident?</td>
<td></td>
</tr>
<tr>
<td><strong>Source</strong></td>
<td></td>
</tr>
<tr>
<td>Does the message provide an opportunity to engage or a call to action to protect oneself or the community?</td>
<td></td>
</tr>
</tbody>
</table>
To test the adapted rubric (Figure 2), a timely warning from an institution not included in the study was analyzed through the rubric. The clarifying questions in italics were added to ensure consistency as each of the four timely warnings collected as a part of this study were analyzed.

A redacted copy of the four timely warnings submitted for analysis in this study are included in the appendices (Appendices E, F, G, and H). To protect the identities of the participants and the institutions they represent, formatting, including headings and logos were removed. This is noted as such images may impact how the warnings are received. Analysis of the two weaker of the timely warnings are discussed first, followed by analysis of the stronger two.

**Epsilon**

The timely warning sent from Epsilon’s institution was sent on the same day of the incident over email. The message was brief and came across as impersonal, reading like a police report. The information provided in the message was limited. The message did not clarify who it was from or include any type of signature. The reader would have to make an assumption that the Department of Public Safety was the sender given that was the only contact information provided in the text. A call to action was found in the middle of the text, encouraging individuals with information to contact public safety. Bullet pointed information towards the end of the warning encouraged safety to the reader and gave a call to action for being an active bystander in, “supporting a safe and respectful community.” The last sentence of the warning clarified that issuance was to be in compliance with the Clery Act.
Omega

The timely warning sent from Omega’s institution was sent in the body of an email message directly from Omega’s email account. The message was sent on a Saturday night in August at 9:30 p.m. from an incident that occurred four days prior. The message does not clarify why the delay in the issuance of the warning, which may not support the urgency or importance of the message. Language used was matter of fact and only two descriptors of the alleged were given, that they were black and wearing a hoodie. There was little to no personalization throughout the message resulting in a “check box” feeling in reading through. The message provided no direction with what to do if you had information or concerns about what was reported. The language used throughout the message was not engaging and included no call to action. The limited language at the end of the warning focused on keeping oneself safe, which reinforces a victim blaming culture.

Gamma

The timely warning sent from Gamma’s institution was an email from the “news” email address for the institution. The subject line was a “University Police Notice” sent on a Tuesday at approximately 5:00 p.m. for an incident that occurred the previous day. The first paragraph of the warning connects the responsibilities of issuing the email to the Clery Act and then clarifies, “this information is provided to encourage members of the [institution name] community to be mindful of their personal safety.” This was followed by contact information for the police department including a phone number and a specific individual’s email address. The description of the alleged provided five individual
identifying characteristics. The end of the warning encouraged connection to the police department and provided a paragraph of language focused on the behaviors typically associated with predators, how to be an active bystander, and how to support a victim. The warning used “you” in language, creating a connection to the reader. While brief, the warning provided a general call to action and provided further connection points for an individual prepared to engage. The last statement on the warning provided links to resources on other safety topics and the opportunity to engage through an app.

Theta

The timely warning sent from Theta’s institution was sent via email on a Wednesday morning, referencing an incident that happened the previous Saturday night, that was reported to a “Campus Security Authority.” The message was sent on University email “letterhead” from the general “Office of Public Safety.” The first sentence acknowledges what the topic the following warning is going to address and provides a local point of contact should someone need assistance. The next statement ties the issuance to the Clery Act, acknowledging this is a requirement geared towards keeping campus, students, and employees safe. The message consistently uses direct and firm language, ties the alleged behaviors to university policy and describes the potential repercussions for such behavior. The message further uses language that is empowering to any reader sharing, “No matter the demographic, the most common type of sexual assault is not committed by a stranger, but by someone known to the victim, typically a date or other acquaintance.” The message provided three points of contact, including an individual on campus, a local support and a national point of contact. In the last
paragraph of information provided, readers were empowered to make a “decision” and “respond” while being given steps to take should the reader or a friend need next step information.

Summary

Through the interviews, participants described the challenges of successfully navigating their responsibilities for the Clery Act. They shared frustrating experiences of working to support the original purpose of the Act but felt like changes over time had created a system of complicated check boxes that pushed them away from providing an outcome that truly worked towards protecting their campus communities and its members. Participants did not communicate partnerships or established relationships with professional staff with training or education that would integrate the use of crisis communication theory in the issuance of timely warnings.

Through the content analysis it was determined that the warnings submitted on behalf of Epsilon and Omega’s institutions lacked consistency and certainty in communication factors used. Omega’s warning struggled to give the reader enough information to get past an understanding phase, whereas the information provided by Epsilon’s institution gave readers enough information in some areas to make decisions and contemplate a response. The issuances from Gamma and Theta provided strong examples of timely warnings that met the communication factors and provided information with a call to action. Both institutions utilized language and other factors (contact information, the way the information was presented) to reach the point of a “respond” with calls to action.
CHAPTER 5

FINDINGS AND DISCUSSION

The primary purpose of this study was to explore and understand the use of crisis communication theory or technique in the issuance of timely warnings as a part of Clery Act compliance. Qualitative methods allowed the researcher to explore and seek understanding of a focused area of Clery Act compliance while hearing briefly from the individuals charged with managing a detailed and ever complicated process to add another layer of protection to their campus communities. The following section will respond to each of the three research questions, including the results of the content analysis, discuss limitations, and share potential future impacts of this study.

Response to Research Question

Research Question 1: How do the individuals with responsibility for issuing timely warnings describe their training and education related to crisis communication?

Participants used broad, general terms to describe their training and education related to crisis communication. Similar, if not the same terms, were used to describe their training and education related to the Clery Act. Both types of training were typically described as a part of a larger training, for example a session at a conference. Clery Center training may be the one example of training described by participants in relation to Clery Act compliance that was not also utilized in describing crisis communication training. National organizations Hursch Blackwell and Delores Stafford were described as a good training resource for both topics. According to D. Stafford & Associates website their firm, “is a professional consulting firm specializing in campus safety and
security, compliance, sexual misconduct response and investigation, and law enforcement issues on college and university campuses in both the United States and Canada.” Hursch Blackwell according to their website, “…supply higher education institutions with top-level comprehensive policy and procedure audits, as well as in-depth systems audits, to identify and remedy potential liabilities.” Both organizations appear to offer support, training, and compliance reviews related to the Clery Act, Title IX, and other forms of campus misconduct. The language in D. Stafford & Associates descriptor reinforces the idea that Clery Act compliance, including the issuance of timely warnings, is done to simply meet a requirement. This does not reinforce the idea that crisis communication theory and subsequent application could better the moment of crisis on a campus community.

During the process of reviewing interview transcripts, it seems as though participants made a connection between the use of the phrase “crisis communication” to the action of communicating during a crisis rather than the theoretical frameworks and applications of “crisis communication.” For example, Alpha struggled to remember the name of a conference they went to with other professionals and then describe a breakout session. Alpha then transitioned their response to discussing a police conference and Clery. Theta responded with more confidence by saying, “…sessions on crisis communication at conferences and some things like NIMS training with what’s included in that. That’s about it.” These and other examples, in retrospect, likely provided examples of trainings focused on how to communicate during a crisis for a chief of police or leader of a public safety unit. It does not appear that these types of trainings focused on
the theoretical perspectives or theoretical understandings but were likely focused solely on practical application.

Research Question 2: What role does collaboration with campus partners play in crafting timely warning messages?

Participants described relationships based on requirement and hierarchical reporting expectations in the creation and issuances of timely warnings. Collaborations with university relations, or similarly positioned departments, to ensure the use of crisis communication techniques or theories in the issuance of timely warnings was not found. Instead, participants described checklist processes and no interest in allowing a campus partner the opportunity to review and edit their language. Epsilon referred to the relationship they had with their university relations department, but in the same breath expressed the lack of a collaborative relationship by stating, “We do. And, but I don’t normally consult them before we send out a timely warning,” when asked if they work with their university relations or equivalent office in the issuance of timely warnings.

Research Question 3: How is crisis communication used in the messaging of timely warnings?

Two of the four timely warnings analyzed met most or all of the criteria outlined in the rubric. Their messages had strong calls to action, empowering the reader through language that should be relatable to the intended audience. The messages were visually appealing, represented the institution and department and also provided one or more points of contact should the reader seek to engage in the call to action.
Alternatively, language used by Omega in the timely warning was problematic for several reasons. At the conclusion of Omega’s warning, they provided several instructional bullet points that put the onus of sexual assault on the victim. Omega also only utilized two identifying characteristics, that the alleged was black and wearing a hoodie, which is incredibly problematic in today’s society. It is this type of language use that reinforces stereotypes and does nothing to resolve the situation.

While neither Gamma nor Theta expressed an established relationship with a University Relations (or equivalent) staff member, they both successfully integrated the use of crisis communication, specifically the use of the hear-confirm-understand-decide-respond model into their timely warning issuances. Since neither of these participants expressed participation or attendance in a training different from other participants, it can be further questioned how these individuals understood to write in this manner while others did not. Gamma and Theta are, however, the two participants with the most years of experience working with the Clery Act.

**Trustworthiness**

The validity of this study is based on the honesty of the participants’ responses. I sought to control my own researcher bias by using a standardized interview protocol with open-ended questions. Data was collected and coded within MAXQDA software, supporting prematurely assigning codes that could have swayed or led the analysis. The participants, although a small population size, generated representation of more than one gender and more than one racial identity. Participants also had varying levels of formal education, from bachelor’s degrees through earned doctorates.
Limitations

The year 2020 was consumed by two national emergencies that impacted the research for this study. On January 30, 2020, the World Health Organization (2020) issued a global public health emergency as a result of the jump in cases of COVID-19. In the following months the United States experienced the declaration of public health emergencies, travel bans, and drastic changes in the day-to-day operations of colleges and universities.

On May 25, 2020, according to the New York Times (Hill et al., 2020), Minneapolis police officers arrested George Floyd, a 46-year-old black man, after a convenience store employee called 911 and told the police that Mr. Floyd had bought cigarettes with a counterfeit $20 bill. Seventeen minutes after the first squad car arrived at the scene, Mr. Floyd was unconscious and pinned beneath three officers, showing no signs of life. (para 1)

In the days and weeks following George Floyd’s murder, the Black Lives Matter movement was reinvigorated gaining national attention. What resulted were months of protests with an uncharted focus on police brutality and a cry to defund police departments nationwide.

Research for this study began in June 2020, approximately four months into the COVID-19 pandemic and only weeks following the death of George Floyd. For college and university police departments this had several impacts. Depending on the size and structure of the institution, it is possible that individuals sought for participation in this study were being asked to lead and/or participate in campus efforts surrounding COVID-
19. Simultaneously, the campaign #8CantWait was being pushed across social media and news platforms, calling for reviews of all police policies, but particularly eight policies that were believed to drastically decrease police violence (Yglesias, 2020).

In October of 2020, the Department of Education eliminated the 2016 Handbook for Campus Safety and Security Reporting, replacing the 265-page document with a 13-page addendum to the handbook on administering financial aid. According to the Office of Postsecondary Education (2020),

Our goal was to provide guidance to institutions that would enable them to focus on maintaining a safe and secure environment, rather than spending time and resources generating reports that few students or parents consult and that could overwhelm them with excessive data that obscures the most important and helpful parts of these reports. (para 5)

Implications

There were two overwhelming takeaways from this research. One, it was possible for a timely warning to be issued utilizing crisis communication theory without the individual issuing the warning engaging in collaborative work or training explicitly focused on the use of crisis communication as demonstrated through the content analysis. However, it does appear that the years of experience an individual has directly working with Clery Act compliance positively contributes into this circumstance. Secondly, this research found all participants expressed challenges in their day-to-day work in meeting the expectations set forth by the Clery Act. Challenges included frustrations with how nuanced the process for collecting information and then reporting that information had
become. Iota commented, “And I think we get too bogged down in the technicalities and
the law has gotten too complex and ever changing that we lose sight and putting so much
resources and time into compliance.” As a result of the overly complicated and
cumbersome process, participants questioned if the current expectations around Clery Act
compliance still met the three original goals of the act. Each participant expressed a
strong sentiment of care for their campus community. They expressed a desire to serve
and protect students and staff members, to provide parents with information that was
relatable and readable to make them an informed consumer.

With the rescission of the 2016 Handbook for Campus Safety and Security
Reporting (Office of Postsecondary Education, 2020) and its replacement being a 13-
page appendix to the Federal Student Aid Handbook, we are at a new place for
understanding what accountability will look like. It is unknown if changes in the political
environment will again impact the expectations in place.

For the better part of twenty years, Gregory and Janosik (2002, 2013) have been
asking questions about the use of Clery Act information, specifically information from
the Annual Security Report (ASR) by parents and students in their reviews of college and
university campuses. Perhaps a national study in alignment with their prior work would
generate results about the content and formatting of the annual reports that are intended to
be a safety mechanism for communities.

Recommendations for Future Research

Issuing warnings to college and university communities has become more
complex as the methods available to communicate have grown. Simultaneously our
campus communities have become more diverse and expect instant communication during times of crisis. The expectations set forth through the Clery Act stemmed from the tragic death of one individual 35 years ago. The expectations that made sense at its creation were created for a different time and a different population of recipients. Additional research on the best ways to communicate with college and universities communities in the current day, during times of crisis, as well as about the safety and security of the campus in general need to be evaluated.

Given the opportunity to repeat this study, I would again seek institutions of similar size and cost of attendance as I believe this resulted in access to similar trainings. I would make adjustments to the information defining theoretical crisis communication and then seek participant understanding of their use of crisis communication in the issuance of a timely warning. I believe it would be impactful to interview college students about the information shared with them from their campus community during times of crisis and also seek to understand their expectations.

Conclusion

Throughout the research process, I was surprised to find that although they came from various professional experiences and had spent various lengths of time in the field, each participant expressed similar sentiments regarding their work related to the Clery Act. Participants shared the challenges related to compliance with an unending desire to serve and protect their communities. I am hopeful that research on the effectiveness of the Clery Act, specifically how parents and students use the Annual Security Report is furthered. How are we actively measuring or engaging in collecting this information?
I sought to better my understanding of how crisis communication theory was or was not used in the issuance of timely warnings. Through the content analysis process, which I found incredibly rewarding, I came to the conclusion that while crisis communication theoretical perspectives were being utilized in two of the issuances, it could not be determined this was done with training, collaboration, or intentionality.
REFERENCES


APPENDIX A

IRB APPROVAL

IRB 210-0198 - Study Approval (Exempt, Category #2)
1 messages

Tue, Jun 9, 2020 at 11:39 PM

Todd Evans <todd.evans@uni.edu>
To: Allyson Rafanello <allyson.rafanello@uni.edu>
CC: Todd Evans <todd.evans@uni.edu>, Anita Gordon <Anita.Gordon@uni.edu>, David Schmid <david.schmid@uni.edu>, Sean Parrish <sean.parrish@uni.edu>

Dear Investigator(s):

Your study, Understanding the Use of Cross-Communication in Dairy Catt Compliance, has been approved by the UNI IRB through the review procedures authorized by 45 CFR 46.104, effective June 9, 2020. You may begin recruitment, data collection, and/or analysis for your project. You are required to adhere to the procedures and study materials approved during this review, as well as to follow IRB policies and procedures for human subject research posted on the IRB website.

If you need to make changes to your study design, samples, procedures, or study materials, please email anita.gordon@uni.edu to request approval of the changes before they are implemented, and attach any revised study materials with edits highlighted. You may expect a response within a couple of days.

Your study will not require annual review and approval by the IRB. However, you will receive an annual study update request, which will ask if the study is still active and if any problems have arisen. Advisers: If your student has graduated, please reply to the annual update request on the student’s behalf.

If at any time you observe any problems or incidents that are serious and unexpected (e.g., you did not include them in your IRB materials as a potential risk), you must report this to the IRB within 10 days. Examples include unexpected injury or emotional stress for study participants, mistakes in consent process, or breaches of confidentiality. The IRB will advise on any next steps that might be necessary.

If you need a signed approval letter, contact the IRB office and one will be provided for your records.

Best wishes for your project success,

Todd Evans
IRB Chair
Hello (insert name),

My name is Allyson Rafanello and I am doctoral candidate at the University of Northern Iowa. I am currently seeking to arrange a phone interviews as a part of my dissertation study with individuals who have responsibility for the issuance of a timely warning, as outlined by the Clery Act, in the Midwest region.

Should you be willing to volunteer, I can assure you that all information will remain confidential and anonymous. Individual participants will be given pseudonyms when referenced and no identifiable information will be included. It is anticipated that the interview would take approximately 45 minutes. If at any point you are uncomfortable with the progress, please notify me that you’d like to discontinue your involvement. If you’re willing to assist me with this research, please contact me at (insert email address) or (insert phone number). Thank you in advance for considering assisting me in completing this research and my doctoral process.
APPENDIX C

INFORMED CONSENT

UNIVERSITY OF NORTHERN IOWA
HUMAN PARTICIPANTS REVIEW

INFORMED CONSENT

Project Title: Understanding the Use of Crisis Communication in Clery Act Compliance

Name of Investigator(s): Allyson Rafanello

Invitation to Participate: You are invited to participate in a research project conducted through the University of Northern Iowa. The following information is provided to help you make an informed decision about whether or not to participate.

Nature and Purpose: This study seeks to understand the education and training experiences of individuals with responsibility for the issuance of a timely warning, as defined by the Clery Act. The results of this research should identify if crisis communication approaches are being utilized in the creation of timely warning messages.

Explanation of Procedures: Individuals will be asked to participate in a 45-60 minute phone interview that will be audio recorded. Questions will focus on the individuals lived, educational, and training experiences regulated to crisis communication with specific focus on the issuance of timely warnings. Individuals will also be asked for identifying information such as their race, gender identity, length of time in the field and educational experiences. Audio recordings will be transcribed. Audio recordings will be destroyed at the conclusion of the study. Transcripts from the audio recordings will be redacted and maintained. Audio recordings and transcripts will be reviewed solely by the researcher.

Privacy and Confidentiality: Information obtained during this study which could identify you will be kept confidential. The summarized findings with no identifying information may be published in an academic journal or presented at a scholarly conference. A separate electronic file that is password protected will track the identity of individuals, for potential future research. Direct quotes, without identifying information, may be used in publications.

Discomforts, Risks, and Costs: Risks to participation are minimal. Risks to participation are similar to those experienced in day-to-day life.
Benefits and Compensation: No direct benefits to participants are expected, but this research may generate important information about the use of crisis communication in the issuance of timely warnings.

Right to Refuse or Withdraw: Your participation is completely voluntary. You are free to withdraw from participation at any time or to choose not to participate at all, and by doing so, you will not be penalized or lose benefits to which you are otherwise entitled.

Questions: If you have questions regarding your participation in this study or about the study generally, please contact Allyson Rafanello at 765-744-5686 or (allyson.rafanello@uni.edu) or my faculty advisor David Schmid, at david.schmid@uni.edu. For answers to questions about the rights of research participants and the research review process at UNI you may contact Anita Gordon IRB Administrator at anita.gordon@uni.edu or 319-273-6148.

Agreement:

I am fully aware of the nature and extent of my participation in this project as stated above and the possible risks arising from it. I hereby agree to participate in this project. I acknowledge that I have received a copy of this consent statement. I am 18 years of age or older.

To indicate if you do or do not agree to participate in this study, please reply to this email with “Yes, I agree.” or “No, I do not agree.”
OPENING REMARKS & INTERVIEW GUIDE

Opening Remarks
Thank you, again, for taking the time for this interview. Your help is greatly appreciated. As I’ve previously shared, I’m a doctoral candidate at the University of Northern Iowa and this interview is a part of my dissertation research.

Before we continue, I’d like to review a few items.
1. All information will remain confidential and anonymous. Interview participants will be assigned a pseudonym and no identifying information will be shared.
2. I’d like to ask your permission to audio record this session. All audio recordings will be sent to a transcription service.
3. Please feel free to ask me to rephrase or clarify any questions that are no clear.

Do you have any questions or concerns for me at this time? (Wait for response.)

If it is okay with you, I’d like to turn-on my recording device and begin our interview. (Wait for response.)

Interview Guide
My area of interest is to better understand the education and training experiences of individuals with responsibility for the issuance of a timely warning under the Clery Act, specifically looking at the use of crisis communication in these issuances.

I’d like to start my questions with understanding more about your current position and subsequent responsibilities.

1. What is your formal position or title?
2. How long have you been in your current role? Worked at your current institution?
3. Do you consider your role to have significant influence on personal safety-related issues on campus?
4. What is your direct role/responsibility for ensuring your institutions compliance with the Clery Act?
   a. (As needed) What specific compliance tasks are you responsible for?
5. How many years have you been working directly with Clery Act responsibilities?
6. How would you describe your level of knowledge of the Act?
   a. How have you gained this knowledge?
7. The Clery Act has been amended several times. Based on your experience, how could the Clery act be amended to reach its three intended goals?
I’d like to learn a little bit more about your specific processes related to issuing a timely warning.

8. Please describe your role in the issuance of a timely warning.
9. Describe documents/policies/procedures developed on your campus to help guide such an issuance.
   a. What specific communication methods are used, if any?
   b. What time frames does your campus adhere to in issuing a timely warning, if any?
10. Do you have a template for timely warnings?
11. Please describe other offices or individuals you may consult with prior to sending a timely warning.
   a. If no mention of University Relations or equivalent, ask why.
12. Training related to crisis communication techniques/theories?
APPENDIX E
EPSILON TIMELY WARNING CONTENT

INCIDENT DATE
April 13th, 2019

INCIDENT TYPE
Sexual Assault

LOCATION/ADDRESS
Student Union Building [redacted]

On Wednesday evening, April 13th, 2019, a female reported a sexual assault to the Department of Public Safety.

The assault was reported to have occurred at approximately 8:30 p.m. on the first floor of the Student Union Building. The alleged offender and the victim are known to each other. Neither the male nor the female are [redacted] Students.

The assault is currently under investigation by the [redacted] Department of Public Safety (DPS). Anyone with information on this case is urged to contact DPS at [redacted]

Sexual assault is never the fault of the victim. While nothing is failsafe, here are some suggestions everyone may want to consider:

- Make sure you have consent. Consent is a clear and freely given yes, not the absence of a no.
- People who are incapacitated by alcohol or drugs cannot give consent.
- Practice being assertive about your boundaries.
- Trust your instincts. If you feel uneasy or sense something is wrong, call for assistance.

Be active in supporting a safe and respectful community. If you see others engaging in disrespectful or inappropriate actions, speak up and get involved, or contact someone else to assist.

This information is being distributed in compliance with the Jeanne Clery Campus Safety Act.
APPENDIX F

GAMMA TIMELY WARNING

From: [Redacted]. News <[Redacted].edu>
2, 2019 5:38 PM
Notice

ce Notice

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Act, this information is provided to encourage members of the community to be mindful of their personal safety.

Contact: University Police
Phone: [Redacted]
Email: [Redacted]

At approximately 2:45 p.m. today, University Police received a report of a sexual assault that occurred between 11:30 a.m. and noon on Monday, Oct. 14. The assault was reported as occurring in the women’s restroom on the second floor of the Student Union.

The suspect is described as a tall, white male, with blue eyes and blonde hair.

Anyone with information about the incident is asked to call University Police at [Redacted].

If you feel unsafe in any situation, trust your instinct and contact University Police immediately.

Predators will work to isolate their victims. Predators often use attention to engender trust, attraction and submission. Bystanders who have knowledge of the above described behaviors and intervene in situations that elicit concern can reduce the likelihood of a sexual crime occurring. You may directly intervene by checking in with either the potential perpetrator or the victim by asking if everything is OK or expressing your concerns about the behavior you are witnessing. You also can delegate when you recognize a concerning situation and feel like someone else is better suited to intervene, by calling police, a friend, or a resident assistant.

University Police provides resources with information regarding various safety topics on its website at [Redacted] as well as on the [Redacted] app.
APPENDIX G

OMEGA TIMELY WARNING

From: [Redacted]
Sent: Saturday, August 12, 2017
To: [Redacted] All Students <[Redacted]>; [Redacted] All Faculty and Staff
Subject: Sexual Assault in [Redacted] Area

All, at about midnight on August 8th, a female subject was sexually assaulted by a male suspect in an alley in the [Redacted] area. The suspect was described as a black male subject wearing a "hoodie" sweatshirt. The [Redacted] is investigating the crime.

- If you go out always try to travel with a friend. There is safety in numbers.
- Be aware of your surroundings. If a situation feels unsafe, it probably is.
- Avoid isolated, dimly lit areas.
- Walk with a purpose. Keep your head up and look around.
- Avoid putting on earbuds so you can be aware of your surroundings.
- Take a cell phone when you are walking or jogging. Insure it is charged and call the police if you see suspicious activity.

Sincerely,
APPENDIX H

THETA TIMELY WARNING

Trigger Warning: This warning addresses a report of sexual misconduct. Resources are available on and off campus to provide assistance. Contact

This information is being released in accordance with the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. The Clery Act requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses, including timely warnings of crimes that may represent a threat to the safety of students or employees.

INCIDENT:
A Campus Security Authority was notified of a rape that occurred on-campus. The assault was committed by an acquaintance in a residence hall sometime last Saturday night.

The only person responsible for sexual misconduct is the perpetrator. It is a violation of university policy to engage in sexual activities without affirmative consent from your partner. Someone incapacitated due to alcohol or drugs cannot consent to sexual activity. This is reflected in university policy. A university student or employee in violation of sexual misconduct policies faces sanctions up to and including expulsion or termination.

It is estimated that nationwide 20 percent of women and six percent of men experience sexual assault or attempted sexual assault during their college years. Data reveal nearly 50 percent of transgender people experience sexual violence. No matter the demographic, the most common type of sexual assault is not committed by a stranger but by someone known to the victim, typically a date or other acquaintance.

If you feel uneasy about a situation, trust your instincts and attempt to interrupt the chain of events. Create a distraction and involve others. Make a commitment to ensure everyone has a safe way home. Being an active bystander doesn’t require you put yourself at risk. If you believe a crime has been committed we encourage you to call the police - 911. To contact More information is available here: https://www.rainn.org/safety-prevention.

We strongly encourage victims to seek medical attention immediately, even if there are no obvious physical injuries. Receiving a sexual assault examination is free and conducted by a specially trained nurse. An examination does not obligate someone to any kind of investigation; however, it allows evidence to be collected and preserved in the event you choose to authorize a criminal investigation at a later time.

In addition to seeking medical attention, there are other options for self-care after an assault, including contacting the Sexual Assault Crisis and Support Line.