

Comment ED-2018-ICCD-0006-0004

Comment: The commenter believes that the Campus Safety and Security Survey should be discontinued.

Response: The Campus Safety and Security Survey is mandated by law, and the decision about whether or not to continue it lies with Congress.

ED-2018-ICCD-0006-0008

Comment: The commenter had a number of suggestions for the Department, including:

1. Removing the screen that states: "Have you combined statistics that you received from the local or state police with your institution statistics for this report? If you answer No to this question, you will be asked to provide the data you received from the local and state police separately."
2. Adding a screen so that institutions can report the total number of unfounded offenses reported by local police separately from the total number of offenses unfounded by the institution's sworn law enforcement agency
3. Removing a screen wherein institutions can separately disclose the total number of persons referred for disciplinary action that were reported by local police
4. Changing the category of "Negligent Manslaughter" to "Manslaughter by Negligence." The commenter also notes that this would comply with the Handbook
5. Allowing institutions to mark more than one type of bias as a motivator for a hate crime

Response

1. This screen remains necessary in cases where the local police give an institution statistics for crimes that occurred on Clery Act geography, but they could not cite the exact location. Very few, if any, schools will need to use the local police screens, but they are necessary in this case. The Department will not remove them.
2. Institutions are not required to categorize unfounded crimes by the part of an institution's Clery Geography on which the crime occurs. Instead, they simply report the total number of unfounded crimes that occurred. Because of this unique situation, the Department believes an additional screen to be unnecessary.
3. While most institutions do not see this screen due to the Campus Safety and Security Survey's skip logic, some do need to fill out this section because of unique relationships between local governments and institutions. We disagree with the commenter's assertion that it should be removed.
4. We agree with the commenter and will make this change.
5. The FBI requires law enforcement agencies to choose one type of bias when reporting hate crimes, and we wish to keep our reporting methods consistent with theirs. The Department will not make this change.

ED-2018-ICCD-0006-0010

Comment: The commenter believes that the Campus Safety and Security Survey should collect data regarding the number of students referred for mental health issues, information from local law enforcement agencies about similar data, the number of students or campus personnel subject to restrictions on owning firearms, and the number of students subject to arrest for any assault or other harm to other individuals.

Response: Changing the Campus Safety and Security Survey to include these data would require Congress to add them as reporting requirements. The Department of Education does not have the authority to make these changes.