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Understanding the Clery Act Compliance Team Policy Instrument Using Contextual Interaction Theory

Shanieka S. Jones
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Walden University

College of Social and Behavioral Sciences

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Shanieka S. Jones

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Walden University
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Abstract

Understanding the Clery Act Compliance Team Policy Instrument Using Contextual

Interaction Theory

by

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MS, Virginia State University, 2012

BS, Virginia State University, 2007

Dissertation Submitted in Partial Fulfillment

of the Requirements for the Degree of

Doctor of Philosophy

Public Policy and Administration

Walden University

August 2021

Abstract

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act is a consumer-protection law solely applicable to higher education institutions participating in student financial aid programs. This study addressed the perceived lack of sustainable institutional implementation efforts, which have become the focus of federal program reviews, subjecting campuses to civil penalties and public scrutiny. A quantitative sequential multimethod study using a survey and content analysis was used to address whether Bressers's contextual interaction theory (CIT) could explain relationships between group dynamics, interdepartmental collaboration, and Clery Act compliance within higher education institutions. Correlational and regression analyses tested connections and causality between interpersonal and policy implementation dynamics and institutional dynamics and noncompliance. The findings indicated that participants appeared to be negatively motivated in terms of their institutions' likelihood of pulling together their Clery Act compliance teams. Results also showed that participants encountered constructive and obstructive forms of cooperation and symbolic interaction with regard to participating in their teams' policy implementation processes. This study also found that inadequate information significantly predicted noncompliance across years of audit history. The findings encourage social change by giving institutions empirical results revealing compliance-practitioner experience as a rationale to assess their organizational and structural environments. Recommendations include future Clery Act research involving the CIT lens to shift the paradigm toward intrinsic programmatic managerialism associated with compliance expectations.

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Dedication

I dedicate this doctoral study to all the little Black American diaspora girls who were discouraged, whether by someone who underestimated their gifts and potential or because they lacked support from their immediate circumstances. They are powerful and capable of much more than the world has limited them to be.

Never stop fighting. You are glorious. You are magic!

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First and foremost, I would like to give honor and glory to God and my Lord and Savior, Jesus Christ. He had sustained me through the ups and downs of this entire process. He provided me with the strength and motivation to finish when I finally placed my concerns at his feet and prayed for his favor.

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Chapter 1: Introduction to the Study

Introduction

According to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act, 2019), any U.S. postsecondary institution that receives federal funds toward student education must meet a variety of requirements involving statistical disclosures, immediate notification, and safety policy for campus criminal and emergency incidents. Any inadequate handling of compliance from a campus threatens prospective student and employee recruitment, current student and employee retention, and external stakeholder influence and support (Chekwa et al., 2013). These risks to a college or university's reputation and credibility are symptoms of an academic institution's inefficiency (Gregory et al., 2016) and have been demonstrated in program reviews conducted by the U.S. Department of Education (ED) that resulted in civil penalties and negative media attention for numerous campuses.

Contributing factors to this problem may include academic institutions' failure to designate a dedicated position responsible for implementing and ensuring Clery Act compliance (Gregory et al., 2016), the degree of clarity with respect to statutory demands, and lack of administrative support (McNeal, 2007). Researchers have focused on campus safety awareness and education (Brinkley & Laster, 2003), campus officials' perspectives about the act's effectiveness (Gregory & Janosik, 2003; Janosik & Gregory, 2003), and immediate campus notifications and response (Han et al., 2015). Limited studies have addressed institutional culture and collaborative networks' effects on compliance efforts. This research not only fills a gap in the literature but leads to social

change by providing useful information for higher education administrators in developing strategic initiatives that address compliance deficiencies.

This chapter begins by outlining the Clery Act's legislative history and evidence of the relevant and current problem. The chapter contains information regarding the study's purpose and includes research questions and hypotheses, the theoretical framework, and operational definitions. This chapter concludes with a discussion of the study's assumptions, scope, limitations, and significance.

Background

The Clery Act has an extensive legal history dating back to its inception, based on Pennsylvania legislation titled the College and University Security Information Act (1988). The state law required its colleges and universities to disclose crime statistics and safety policies. During this time, campuses nationwide did not disclose comprehensive crime data despite evidence that campus crime was prevalent among students, including violent incidents involving the use of alcohol and drugs. Two years after the 1988 Pennsylvania legislation, the George H. W. Bush administration signed the federal Student Right-to-Know and Campus Security Act (1990) as an amendment to the Higher Education Act (HEA) of 1965. According to the amendment, the few U.S. institutions of higher education (IHEs) that voluntarily disclosed crime statistics had inconsistent crime definitions and data collection issues. The 1990 legislation aimed for consistency and transparency among IHEs. It also encouraged institutions to develop safety and security policies to establish a national baseline for crime prevention within higher-education settings (Janosik, 2004).

The 1990 act also required institutions to issue an annual report regarding how to report crimes, security and access of campus buildings, descriptions of campus law enforcement authority and crime-prevention and security programs, policies regarding alcohol and drug use, and statistical disclosures for on-campus incidents involving murder, rape, aggravated assault, burglary, motor vehicle theft, liquor law violations, drug violations, and illegal weapon possession. It further demanded timely notifications of community threats. The legislation predicated consistency among those obligated to comply with the law with the aim that prospective students understood their potential educational environments. Minor amendments changed the reporting period from academic year to calendar year (Student Right-to-Know and Campus Security Technical Amendments, 1991). With the next round of HEA (1992) reform, institutions were required to include policy statements about sexual assault prevention efforts, programs, and procedures in their annual disclosures.

A subsequent HEA (1998) amendment enumerated an extended category of Clery Act-reportable crimes, referred to as primary offenses, to be reported (e.g., negligent manslaughter, “non-forcible” sex offenses, arson, and hate crimes). It added three geographical categories (residence halls, noncampus property, and public property) under which crime statistics should be disclosed, referred to as Clery geography. This amendment was renamed for Jeanne Clery, a student whose parents advocated for enhanced campus safety after their daughter’s death at the hands of a fellow student. It demanded IHEs submit statistical disclosures to the ED to equip likely community affiliates to sufficiently prepare for public health issues (Gardella et al., 2015). This

amendment mandated Pennsylvania's renewed College and University Security Information Act's (1994) progressive crime log requirements by stipulating how an institution should add and update entries. An additional amendment in 2000 required IHEs to provide information regarding local sex-offender registries while maintaining privacy laws (McCallion, 2014).

The Higher Education Opportunity Act (HEOA, 2008) further amended the Clery Act by requiring institutions with on-campus student housing to publicize procedures for missing students, describe relationships with local law enforcement agencies, and outline protocols for disclosing the results of any disciplinary proceedings for violent and non-forcible sex crimes. In addition to earlier hate crime requirements, campuses had to disclose bias-related statistics involving intimidation, larceny-theft, simple assault, and destruction and vandalism of property (HEOA, 2008). Perhaps the most notable change was after the active shooter incident that resulted in the injuries and deaths of dozens of individuals at Virginia Polytechnic Institute and State University. After this event, IHEs had to disclose emergency response and evacuation procedures to their on-campus population. Such disclosures were substantiated by testing, evaluating, and publicizing any existing plans (Institutional Security Policies and Crime Statistics, 2011).

The most recent change came through the Violence Against Women Act (VAWA, 2013) reauthorization. The VAWA created the Campus Sexual Violence Elimination Act (2013), which demanded new Clery Act reporting requirements. These new clauses predominately focused on crimes involving intimate-partner violence. Specifically, institutions were required to compile, classify, and disclose statistics involving domestic

violence, dating violence, and stalking incidents. They were further required to develop primary prevention and ongoing awareness campaigns regarding sexual violence and to develop and implement procedures addressing reported sexual violence incidents (VAWA, 2013). IHEs were also mandated to disclose information regarding provisions and services for victims of sexual violence.

FBI Uniform Crime Reporting (UCR) and Other Guidance

Currently, there are four primary tenets of compliance to the Clery Act: the annual security report, daily crime log, emergency and timely disclosures, and prevention programs and disciplinary procedures to address sexual misconduct. These tenets represent annual, ongoing, and immediate requirements, each with intricacies and layered obligations. According to the Institutional Security Policies and Crime Statistics (2020) federal regulation, the annual security report demands numerous policy statements in addition to statistics for over 20 Clery Act-reportable crimes (this count lists each reportable hate crime individually).

This form of standardization allows IHEs to produce statistical information using the same criteria, making said information comparable nationwide. Before and after the VAWA Final Rule (2014) publication, which became effective July 1, 2015, the criminal definitions' resource for primary offenses and hate crimes was provided by the FBI UCR Program. However, added intimate-partner-violence crime categories mentioned previously were compounded by changes in the FBI's classification of sex offenses. First, the crime category changed from forcible and non-forcible sex offenses to sex offenses. Second, the crime of rape broadened in scope. The initial categorization limited rape to a

forcible act between a male and a female where a male inserted his genitalia into a female (OPE, 2011). After the reclassification, rape was defined as “the penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim” (Title IV Federal Student Aid Programs Violence Against Women Act [VAWA Final Rule], 2014, p. 62789). Other changes included adding gender identity as a category of bias for hate crimes, exempting arrests and referrals for weapons, drugs, and liquor law violations from the hierarchy rule, and requiring institutions to count unfounded crimes (Institutional Security Policies and Crime Statistics, 2015; OPE, 2016). The hierarchy rule requires institutions to disclose the most serious criminal offense when more than one occurs in a single incident.

For years, the ED had provided subregulatory guidance to IHEs. Initially titled *The Handbook for Campus Crime Reporting* in 2005, *The Handbook for Campus Safety and Security Reporting* (hereafter Handbook) of 2011 and its 2016 rerelease changed to accompany these legislative changes. Edition updates also included how institutions should classify criminal incidents according to where they occurred (OPE, 2016). For example, regulatory definitions include the phrase “reasonably contiguous.” The Handbook’s clarification of this and other nuanced terms expressed the ED’s expectations of which buildings and properties IHEs should consider relevant for statistical disclosures, thereby impacting how IHEs collect data.

This historical context is critical in understanding how collaborative working relationships among campus and external partners are dictated and defined and how the federal government accommodates changing social issues involving types of crimes

occurring in higher education. By adding gender identity as a classification of bias and reconfiguring the sex offenses category, the ED made inclusiveness a component in statistical disclosures. Institutions are now required to recognize discrimination against nonconforming individuals, and those who were born male can be victims of sexual assault.

Reviewing the act's legislative changes throughout its 31-year history reveals potential wider and structural contexts that affect IHE policy actors' positional and personal factors, such as their responsibility to compliance and fluctuating commitment affected by increased regulation. It also suggests how actors may change their implementation strategies accordingly. Amid these changes, there remains a systemic problem involving IHE administrators. Clery Act compliance has been historically plagued by clarity and structural issues (McNeal, 2007; Gregory et al., 2016) and, by extension, is rarely considered a multifaceted field subject to policy implementation standards. This study addressed the struggles of IHE administrations with Clery Act compliance and fills the gap in existing literature by accounting for the effects of implementing organizations' knowledge, capacity, and support, or lack thereof. It endeavored to advance the practice of compliance under public administration.

Problem Statement

Policy addressing campus safety continues to evolve as an area of concern for students, parents, supporters, and administrators. The National Association of Clery Compliance Officers and Professionals (NACCOP) lists pending legislation to address prevention and response to hate crimes, further combat sexual assault, and improve and

expand fire-safety education programs in higher education. All such proposals would lead to further amendments of the Clery Act and heighten campus safety accountability for IHEs.

This likelihood of increased regulation supports federal and national reports that the act is burdensome. However, there is disagreement regarding the necessity of the legislation. One view asserts that the Clery Act requires much but fails to uphold its purposes and is primarily symbolic. Another view holds that the act makes campuses safer now that there is an abundance of training and a clear understanding of institutional efforts and collaborative approaches needed for compliance.

The concept of collaborative act compliance between relevant departments or individuals instead of the responsibility left solely to campus law enforcement or security is still advocated for by researchers and practitioners. Challenges to collaborative and strategic compliance include each campus being characterized by different structures, issues, and personnel that affect how and how well compliance programs are implemented. Institutions are expected to satisfy statutory and regulatory requirements, including considerations regarding their unique physical location and proprietary endeavors. Miller and Sorochty (2014) remarked that complying with governmental regulations requires responsibilities and duties, the first of which is to know the law, but the more important of which is correctly responding to laws. These variances in institutional structure, operation, and interpretation explain the issue. The general problem is that IHEs do not understand how to achieve the ED's Clery Act policy outcomes (McNeal, 2007; Woodward et al., 2016).

Institution-wide implementation has become the criterion of whether a college or university sufficiently meets federal regulations and expectations of the act. The Office of Postsecondary Education's (OPE, 2021) *Clery Act Appendix for FSA Handbook* identified the ED as the enforcement agency for the Clery Act's codified requirements. However, audits consistently specify the codified regulations campuses fail to comply with and the ED's interpretive principles in their finding explanations. Often, it is difficult for campus stakeholders to understand their role and for campuses to understand the level of administration the ED expects to be in place. The specific problem this study addressed is the impact of contextual factors on institutions' abilities to comply with the Clery Act. The present study fills a gap in the literature by accounting for differences in organizational structure that shape the characteristics of practitioners involved in Clery Act implementation processes.

Purpose of the Study

The purpose of this quantitative study was to expand the knowledge of the Clery Act's effects in higher education using a public policy and administration lens by examining relationships between compliance-practitioner and organizational characteristics and compliance variables. The independent variables were practitioner motivation, information, and power. The dependent variables were likelihood of application, degree of adequate application, and institutional compliance. IHE characteristics were the moderating variables. These variables are discussed in further detail in Chapter 3.

The method of inquiry involved using consecutive survey and nonexperimental secondary analysis designs. These types of designs were implemented to explain how context (wider, structural, and individual) across U.S. postsecondary institutions impacts compliance-practitioners' interactions and explains Clery Act noncompliance issues.

Research Questions and Hypotheses

The first and second research questions were for the study's first phase. They included operational definitions, such as Clery Act compliance team (CCT) and likelihood of application, the second of which is unique to the study's theoretical framework. The third research question was interconnected with the study's second phase. The research questions for this study were:

RQ1: How do actor motivation, information, and power impact CCTs' likelihood of application at IHEs?

H_{a1}: Campus CCTs' likelihood of application is more likely to experience forced cooperation if there are imbalances between motivation, information, and power.

H₀₁: There is no statistically significant difference between the likelihood of application situations campuses' CCTs encounter based on actor characteristics.

RQ2: How do actor motivation, information, and power impact CCTs' degree of adequate application at IHEs?

H_{a2}: Campus CCTs' degree of adequate application is more likely to experience negotiation or conflict if there are imbalances in motivation and information with relatively equal power between actors.

H₀₂: There is no statistically significant difference between the degree of adequate application situations campuses' CCTs encounter based on actor characteristics.

RQ3: Which characteristic (motivation, information, and power) exerts the most significant influence on institutional compliance?

H_{a3}: Of the three characteristics, power will exert the most significant influence on institutional compliance.

H₀₃: There is no statistically significant difference between the influence exerted on institutional compliance by motivation, information, and power.

Theoretical Framework for the Study

The contextual interaction theory (CIT) synthesizes top-down and bottom-up schools within policy implementation theories. In brief, top-down public policy is autocratic leadership that includes the development of generalizable and clear laws and regulations dictated at high levels of government. It involves the input of stakeholders and lobbyists, which are then implemented by civil servants or lower-ranking employees (Sabatier, 1986). Bottom-up policy leverages the networked input of civil servants or lower-ranked employees to develop micro-level and impactful programs. The CIT was introduced by Bressers (1983) and addresses social interactions amid policy implementation via simplification of vast contextual considerations into three core variables. Those core variables are the motivation, information, and power of the individuals responsible for any policy's implementation and represent definitive

characteristics influenced by wider, structural, and individual contexts (Bressers, 2009; Vikolainen et al., 2012).

Motivation incorporates personal and external influences that motivate or demotivate an actor's participation in the policy implementation process (Hophmayer-Tokich, 2013). Information refers to the actors' general knowledge about policy and its compliance, accessibility to information, transparency, and documentation (Owens & Bressers, 2013; Owens, 2016). Finally, power is conceptualized as capacity and control. Capacity and control take into account and are thereby defined by the number of resources an actor has, the group or individual areas of responsibility, and one's reputation of power among colleagues (Owens & Bressers, 2013). These conceptual independent variables are used to predict and explain process interactions between those involved. The framework's analysis is actor-centered and combines varying degrees of those core variables to understand whether implementation is accomplished, avoided, or altered (Owens, 2008).

The CIT was selected as this study's framework because of its deductive approach and because its variables are punctilious yet inclusive. Owens (2008) charted previous literature and showed the theory condenses the mass reality of interface into three manageable variables and factors empirical hypotheses that investigate the variables' effects logically. It also connects the start and end of the policy process without overwhelming the analysis or interpretation of results with the complexities of that mass reality (Owens, 2008). The CIT's emphasis on implementation actors, which for this

study are the Clery Act's IHE compliance practitioners, offers insights into administering a Clery Act compliance program. The CIT is discussed in further detail in Chapter 2.

Nature of the Study

This study was quantitative in nature. It was a sequential quantitative multimethod study that involved using secondary data obtained from the ED and publicly available websites. Data included audit documents, also referred to as program reviews, regarding public, private, and two- and four-year institutions. This study built on existing research on institutional resources and collaborative efforts by providing data that informs administrative management. Thus, a questionnaire was disseminated to an IHE professional association to exercise the CIT's deductive logic on a large scale. Content analysis was then conducted to quantify the program reviews' text to extend the questionnaire's results. This method drew necessary connections between actors' CIT social-process interactions and Clery Act policy implementation outcomes.

Quantitative content analyses required a technique that produces replicable and valid conjectures (Neuendorf, 2017). The technique involved categorizing keywords and phrases of each collected review into the CIT's motivation, information, and power constructs and using those frequencies to draw inferences outside of the documents' original purpose.

Comparisons and interrelations within each data set were conducted using correlational, regression, and other computational analyses, including chi-square, an independent samples *t*-test, and analysis of variance (ANOVA). This quantitative analysis helped to address connections between the CIT's core independent variables, IHEs'

moderating characteristics, and implementation process and compliance issues (the study's dependent variables) that they are likely to encounter.

Definitions

Administrative Capability: The ability of an institution to adequately administer a Clery Act program by designating a dedicated expert to manage compliance efforts; demonstrating cross-departmental collaboration; exhibiting varied types of crime data reconciliation between IHE campus colleagues throughout the calendar year; having written policies and operating procedures; proving a general understanding of the act and the campus's compliance responsibility; avoiding gross noncompliance; using action plans to identify and resolve discrepancies; and appropriately centralizing, retaining, and destroying documents (Standards of Administrative Capability, 2011).

Clery Compliance Officer (CCO): A compliance practitioner and employee of the institution who serves as the campus's Clery Act compliance expert, is responsible for their IHE's Clery Act compliance program, and manages its compliance efforts. The CCO may be part- or full-time, and their designation may be dedicated or collateral. They may be equipped with the autonomy and requisite training needed to build partnerships and compel participatory involvement from members of the CCT and other appropriate actors (Gregory et al., 2016). They are institutional liaisons and are also referred to, in this study, as implementers.

CCT: A cross-departmental team supported by high-level institutional administrators and composed of the CCO and target groups who work collaboratively to build durable relationships, share a vision and mission, have well-defined

communications, contribute resources toward a comprehensive Clery-compliance action plan, and otherwise meet the administrative capability standards. Through the work of a CCT led by a resident subject-matter expert, risk can be mitigated effectively throughout the calendar year. The risks of noncompliance and rewards of a successful compliance program are shared (Clery Center, 2015; Swope, 2015).

Compliance: An institution's meeting of the requirements outlined in the Clery Act and its related regulations. Those requirements are collecting, classifying, and counting crimes; issuing campus alerts and warnings; providing education programs and campaigns related to sexual and partner violence; disclosing procedures for institutional disciplinary action related to sexual and partner violence; publishing an annual security report; maintaining a daily crime log if applicable; disclosing missing student notification procedures if applicable; maintaining a fire log if applicable; publishing an annual fire safety report if applicable; submitting crime and fire statistics to the ED; and demonstrating administrative capability (Reporting and Disclosure of Information, 2011; Institutional Security Policies and Crime Statistics, 2019). This definition includes the regulation applicable when the Phase 1 survey instrument was disseminated to provide the necessary context for the study's findings. This definition does not apply to Phase 2.

Conflict: A likely confrontational consequence if the personal or professional incentive to participate in a CCT's policy implementation is not favorable for all its members, and the person who is most positively incentivized has sufficient information about the policy task at hand, yet there is a relatively equal balance of power between team members. Conflict involves an oppositional response such as ending

communication or exerting positional power to impede progress or question policy outcomes (Bressers, 2004; Owens, 2008).

Degree of Adequate Application: The extent to which the incentive to participate in the implementation process remains intact. For this study, adequate application refers to the extent to which incentives for the implementer and target group to participate in the CCT persist as they work through the implementation process. The adequate application of a policy instrument does not refer to whether changes are achieved or whether all regulatory requirements are followed. Any adaptation to the CCT to improve efficiency should be considered under the context of whether it incentivizes its members (Bressers, 2004). Also referred to as adequate application.

Forced Cooperation: A likely consequence if the application of a CCT contributes positively to the objectives of one team member but not to those of others (i.e., there is an imbalance in motivation), and that benefitted person has more information about the policy task at hand, forcing others to rely on them throughout the implementation process (Bressers, 2004).

Implementing Organization: An IHE that receives U.S. federal Title IV student financial aid and must comply with the Clery Act, including public and private postsecondary institutions. IHEs that must comply with the act include locations serving students who do not receive aid but are Title IV eligible and those with at least one postsecondary student but primarily serve secondary school students (OPE, 2016).

Information: CCT members' general knowledge about policy and its compliance, accessibility of information, and degree of transparency in content, context, and data.

Information also involves a member's frame of reference, interpretations inspired by professional backgrounds and acquired skills (Hophmayer-Tokich, 2013; Owens & Bressers, 2013), and documentation (Owens, 2016).

Likelihood of Application: The possibility that a policy instrument will be applied to any extent (Bressers, 2004), including whether to establish or convene the instrument.

Motivation: Personal and positional factors that either incentivize and engage or demotivate an actor's participation during the policy implementation process, which include self-values and interests, values and interests of an actor's employer, or the values and interests of other influential entities (Hophmayer-Tokich, 2013).

Negotiation: A likely consequence where there is a compromise among implementing actors through transparently communicating their objectives when the implementation of a CCT does not benefit all actors involved (i.e., there is an imbalance in motivation), the positive actor has sufficient information, and there is a somewhat equal power balance (Bressers, 2004).

Noncompliance: An institution's failure to establish administrative capability or otherwise meet any Clery Act legislative or regulatory requirements.

Policy Instrument: An innovative intervention employed by an institution implementing a policy to effect and support social change. For this study, the CCT is the policy instrument.

Power: An actor's authority to enact policies. Power involves an actor's persuasive abilities, elevated or confidential access, and the benefits of those advantages.

Power also involves an actor's understanding of their capacity, authority, and control compared to others (Owens & Bressers, 2013).

Target Group: Employees within IHEs other than the CCO who are most affected by the Clery Act and are, thus, required to meet or assist the institution with meeting act standards and regulatory demands.

Assumptions

Simon (2011) noted that research assumptions are reasonable beliefs with respect to a study's methodological techniques. Assumptions for this study involve its data collection methods. It was assumed that content written in program reviews were based on conclusions drawn from the highest level of field expertise. It was also assumed that content had not been altered (e.g., only a portion of a review's findings being published). It was further assumed that the ED did not conduct a Clery Act-focused program review that was not released for public viewing. It was believed that because the reviews spanned two decades, the impact of the results would be of great value to Clery Act practitioners. It was presumed that respondents answered the questionnaire candidly and did so without ulterior motives or the impression that they would receive compensation or incentives for their contributions. Finally, it was presumed that the surveyed participants experienced challenges within their campus's CCT and that each program review involved findings of Clery Act noncompliance.

Methodological assumptions were not the only unexamined beliefs associated with this study. There were also theoretical assumptions. The CIT presupposes policy process outcomes are not a mere result of its inputs but fundamentally depend on actor

motivation, information, and power (Bressers, 2007). Bressers (2007) concluded that these three core characteristics influence each other and lose their insight into policy interface when examined or considered in isolation. The actor-centered theory also assumes that implementation goals are either accomplished, avoided, or altered. The CIT recognizes that any deduced likelihood of application or degree of adequate application interaction depicts one of many possibly experienced interactions (Owens, 2008). Acknowledging these methodological and theoretical assumptions is necessary to this study's credibility and data interpretation.

Scope and Delimitations

The scope and delimitations of this study were framed by its purpose and objectives. Each population included elements of stakeholder engagement, existing administrative operations, communication, resources, structures, and organizational climate. These elements are appropriate, considering this study was guided under a public policy and administrative lens.

The target population for the study's first phase was limited to members of various higher education professional associations. These individuals were chosen because they had Clery Act compliance obligations. A connection between their job responsibilities and the Clery Act could be identified by reviewing the legislation or federal audit findings. For example, regulation states that statistics concerning "arrests or persons referred for campus disciplinary action for liquor law violations, drug-related violations, and weapons possession" reported to campus security authorities (CSAs, Clery Act mandated-reporters) shall be disclosed in campuses' annual security reports

(Clery Act, 2019, p. 631). Therefore, student conduct administrators (SCAs) were included in the Phase 1 population since they are responsible for handling student disciplinary action. Selected associations included employees at institutions with religious affiliations and specialized missions (e.g., historically Black colleges or universities). Additionally, the target population was specific to the institutional membership category and excluded international memberships. This approach addressed potential external validity issues by including a wide range of practitioners with responsibilities to compliance.

It was critical that the questionnaire focus on the business support functions of minimizing risk, prioritizing tasks, establishing a collaborative relationship beyond occasional communicative occurrences. It needed to delve into internal and external influences that explain commonly made mistakes. Questionnaire questions were written in a manner that would not test the participants' knowledge, or lack thereof, regarding any of the Clery Act's compliance areas. For example, participants were not provided an example incident and asked to classify the incident according to the FBI UCR. The questionnaire aimed not to determine their understanding of the intricacies of specific requirements but instead to survey practitioners' comprehension of their responsibility to comply and incentives or hindrances toward doing so.

The target population for the study's second phase was conditionally limited to Final Program Review Determinations (FPRDs) or Expedited Determination Letters (EDLs), which are the ED's published Clery Act compliance findings. An institution's

FPRD was included in the population unless it had published preliminary findings in the form of a Program Review Report (PRR) instead.

Study results were expected to extend beyond the sample and represent the general field by including various field practitioners and accounting for actor processes. While the study's focus was specific, the findings are likely meaningful to varying populations (e.g., Clery practitioners, IHE administrators, and academics). Social validity was achieved through quotidian variable terminology comprehensible to a general audience. The manner of analyses permitted relevance and generalizability throughout the legislative changes previously described.

Limitations

It was important to address the study's purpose and objectives while developing a methodology that accounted for potential weaknesses. Simon (2011) wrote that weaknesses are uncontrollable constraints inherently built into design choices that unexpectedly arise during a study. Compliance with the Clery Act is an institutional responsibility that includes consistent effort from select departments and intermittent contributions from others. Accordingly, the Phase 1 population did not include potentially intermittent campus partners, such as university and college attorneys. Instead, the population included positions with direct responsibility for statistical disclosures via crime case or student conduct management. The population also included positions that otherwise are likely to receive crime reports, provide that information to the implementer, and conduct daily business functions that directly impact Clery geography determinations. The ED Office of Federal Student Aid (2012) emphasized that the ability

to write sufficiently detailed information, reflective of adequate training, is imperative to Clery Act-reportable crime counting and classification.

Phase 1 participants self-reported their experiences, and their responses may have included their exaggeration and attribution biases. The Phase 2 content analysis focused on words and phrases in isolation, so surrounding context may not have been accounted for when determining associations or cause and effect. Additionally, legislative changes over time may have affected responses to the questionnaire and its results. It is antithetical to academia to ignore the possibility of bias. My experiences as a CCO influenced the study's direction and may have been a biasing factor by affecting my interpretation of the results. However, these limitations were mitigated by saturating the literature, understanding the need for social change, and following the prescribed assumptions within the theoretical framework.

Additional limitations involved participation. Due to the uncertainty of the Coronavirus disease (COVID-19) pandemic, the study had to continue without responses from all associations in the Phase 1 target population. It is suspected that association members became unwilling to participate in the questionnaire after grappling with the effects of the nationwide lockdown. Time and access also impacted this study. The populations needed to be feasible to keep the study's findings relevant since the time it took to complete the study was already lengthened by employing multiple methods. It was more practical to analyze publicly available secondary data in Phase 2 than to submit a public records request to the ED for unpublished information, such as institutions' responses to PRRs.

Significance

This research will fill a gap in the literature by understanding Clery Act compliance using a public policy and administration lens. Professional associations use program reviews and studies to train practitioners on developing strategic initiatives that address compliance deficiencies. The study addressed an area of higher education that has been under-researched due to variances in institutional responses and a lack of understanding of the Clery Act's programmatic, operational demands. Findings from this study will lead to social change by providing practitioners with information regarding the extent to which organizational environments can influence responsibilities to procedural aspects or campus safety policy development. These insights will aid administrators in shifting the cultural paradigm and encourage practitioners to consider reflectively the current roles on their campus. This study will provide recommendations for effective partnerships and be a reference for training and planning workshop initiatives facilitated by those same professional associations. The Clery Act has been in effect for 31 years, yet addressing compliance with a comprehensive strategic approach is new in practice. With the recently heightened focus on campus crime demanding pragmatic efforts, this study involves defining said efforts.

Summary

The Clery Act has a longstanding legislative history, and its amendments increase IHEs' accountability to campus safety with each iteration. Throughout the years, the law has remained demanding and underpins collaborative working relationships among campus partners to address the needs of the burdensome law. Nonetheless, compliance is

often ambiguous and is caused by various reasons, including organizational structure and leadership deficiencies rather than an unwillingness to disclose safety information. This study expanded on the current literature by examining under-researched contextual factors' effects on act compliance. The CIT and the relevant research are the focus of the next chapter.

Chapter 2: Literature Review

Introduction

This chapter highlights links between institutional and actor characteristics and policy implementation in higher education with specific considerations of Clery Act compliance. Although the HEA accounts for many configurative differences among and within postsecondary institutions, compliance has remained inconsistent among college campuses. IHEs continue to grapple with legislative clarity and understanding how their institutions' uniqueness affects the act's applicability (McNeal, 2007). Therefore, this study aimed to expand knowledge of the effects of the act in higher education by examining relationships between motivation, information, power, considering their individual and organizational contexts, and compliance.

The difficulties in policy implementation were evident before Congress enacted the act and are consequently an inherent issue. Smith (1989) commented that postsecondary administrators failed to be completely forthright about criminal incident disclosures out of concern for their institutions' reputations. Years later, studies found that law enforcement personnel, student affairs officers, and housing administrators who worked in higher education and were members of various professional associations believed campuses were not being candid about campus safety issues and were hiding crime data (Gregory & Janosik, 2003, 2006; Janosik & Gregory, 2009). These beliefs were accompanied by caveats indicating that the professionals also did not believe intentional statistical inaccuracy to occur commonly. Nevertheless, these findings highlight the concern that IHEs are not exempt from power deference effects. They can

experience overly deferential cultures based on senior leadership or board of trustees' values. According to McNeal (2007) and Stensaker (2015), organizational identity and reliance on managerial leadership affect compliance efforts. The values, beliefs, and perceptions of administrators are potential obstructions to motivation, information, and power. They can easily create adverse influences by placing an institution's reputation above its federal regulatory obligations.

This chapter includes strategies used to find supportive literature followed by a comprehensive look at the CIT. Next, previous research addressing IHE contexts is discussed. The chapter concludes with information regarding how this study fills a gap in the literature.

Literature Search Strategy

Literature for this study was obtained using a frequentative process. Initially, the scope of the query was limited to the legislation itself using ERIC, SAGE Journals, Thoreau Multi-Database Search, ProQuest, and Google Scholar available through the Walden University Library and the California State University, Monterey Bay Library. Public laws were found using Google. After consultation, searches were expanded regarding campus crime. The following keywords, and combinations of, were used: *administration, campus crime, campus police, campus safety, Clery Act, college, compliance, differences between public and private, Higher Education Act, improving compliance, judicial affairs, leadership in campus housing, living-learning communities, postsecondary, RA training student housing, reporting, resident advisor, residential life, student conduct, student housing, Title IX, Title IX in higher education, Trump*

administration divisive, university, policy implementation, organizational identity, higher education, strategic management, change, leadership, governance, and contextual interaction theory. When seeking literature regarding public policy, there were no limits in terms of dates. In contrast, when looking for information regarding the current applicability of the CIT, my initial search did not include studies that were published before 2010 (see Appendix A).

Theoretical Foundation

The CIT addresses social interactions amid policy implementation, so it is necessary to discuss the principles of policy implementation. The two primary schools of thought are top-down and bottom-up policy. The third represents an amalgamation of the two by various researchers to integrate the strengths of both.

Proponents of the top-down approach to public policy believe decisions involving public issues or agendas are determined at the government level and delegated to civil service employees accountable to elected officials (Hill & Hupe, 2002). Van Meter and Van Horn (1975) explained that policy implementation was most successful when opinions and preferences toward goals result in an overwhelming majority consensus. They also pointed out that the study of policy implementation involves examining multiple actions over an extended time. To similar ends, Sabatier (1986) emphasized that proponents of top-down policy implementation tend to ask questions examining actions and alignment with policy decisions and objectives in relation to a policy's impact. He further maintained that top-down policymakers consider the influential factors toward outputs and impacts and how policies may have been reformulated over time based on

experience after their adoption. These explanations are pragmatic and meet Sabatier and Mazmanian's (1980) proposed variables: tractability of the problem, a statute's ability to structure the problem, and the effects of non-statutory variables on implementation. If legislators are convinced of an issue, the policy devised to address the concern results from overhead democracy. Legislature dictates which institutions are selected, guides the provision of resources, and regulates the participation of nonagency actors during the implementation process (Sabatier & Mazmanian, 1980). However, Sabatier and Mazmanian did not account for policy reformulation, which is a challenge of top-down policy. Changes toward more effective implementation are likely to occur at a slow pace, and examination throughout a policy's lifespan is challenging given its autocratic development. The top-down approach to policy implementation is deductive (Lee & Zhong, 2014) and is characterized by minimal considerations of ground-level implementation politics, ambiguity involving the policy and government expectations, and conflict between government intentions and the practicality of a policy's effects.

Conversely, proponents of bottom-up policy implementation advocate that "street-level bureaucrats" mitigate the likelihoods policies will fail by lending their practical expertise during the early stages of the policy process (Matland, 1995; Lipsky, 1980, as cited by Rice, 2012, p. 1039). Street-level bureaucrats directly interact with those for whom the policy was made and have discretion in execution, including modifying goals to be more realistic to the local scale or target audience and asserting priorities. Bottom-up theorists stress the importance of understanding the micro-level and mapping networks to understand building momentum that reaches government (Matland,

1995; Paudel, 2009; Weatherley & Lipsky 1977). They recognize an existing paradox that prioritizes community interest while inhibiting expeditious responses to public concern.

Classic top-down beliefs regarding autocratic policy and law ambiguity reflect the current challenges of Clery Act legislation. Studies revealed that the ED has not provided enough guidance and training after the mandate was enacted (McNeal, 2007; DeBowes, 2014), and additional challenges are created by the lack of government funding available to support compliance efforts. IHEs are not provided with the financial resources necessary to meet federal expectations for comprehensive program development involving adequate numbers of capable individuals to address compliance. Top-down theorists' focus on dictation of regulation explains the consistently inefficient networking at IHEs when examining Clery Act compliance.

There are also bottom-up characteristics that affect Clery Act compliance. IHEs' noncompliance with the consumer-protection law is not the responsibility of the ED, although the government determines the act's policy goals. Instead, entire institutions are liable to public accountability and thereby plagued by negative media attention and civil penalties in the amount of \$59,017 (Adjustment of Civil Monetary Penalties for Inflation, 2021). The Clery Act requires that institutions develop various policies. Disclosures of policy addressing crime reporting, building access and security, programming, and disciplinary response demand a decentralized approach for developing and maintaining numerous procedures and practices that benefit a campus's unique culture.

The act's pliability regarding top-down and bottom-up theory principles necessitated an amalgamated theory appropriate for this study. The simplified policy process framework involves identifying problems, setting agendas, and creating and adopting policies before implementation or administration (Anderson, 2014). This simplified process relates to the principles of policy implementation by acknowledging the distinct stage where change occurs via transforming policies into procedures and programs. O'Toole (2004) referred to this change as the theory-practice issue. He argued that the issue exists because of the normative differences regarding knowledge and expectations between a policy's actors that complicate the transition from statute to action. The CIT was chosen for this study's theoretical framework to understand the impact of normative differences on theory-practice outcomes.

The CIT was developed by Bressers, a Dutch researcher, in 1983 as part of his doctoral dissertation but was first named instrumentation theory and later named policy instrument theory (Owens, 2008). The theory has since been developed and tested, building on Bressers's initial concepts, assumptions, and applications. As it exists today, the CIT intersects implementation, governance, and networks, which are all reoccurring themes in studies involving public policy. The theory extends beyond desirable policy process characteristics and emphasizes the actors composing policy networks and participating in governance (Owens, 2008).

By applying the CIT to Clery Act implementation, practitioners and researchers can address compliance issues with another lens than those used in the previous literature. They can candidly and critically examine the dynamics of conflict or incentivization. The

CIT's basic assumptions are actor-centered and examine how the variables of motivation, information, and power do not operate in isolation and dictate the outputs and outcomes during the policy implementation process (Bressers, 2004; Bressers & de Boer, 2013).

Motivation involves internal, external, personal, and positional influences (Hophmayer-Tokich, 2013). Each actor carries varying levels of expertise, values, interests, and organizational identity. As one would expect, if an actor feels disengaged from the process, that their needs are not being met, or that expectations or assignments are tedious and daunting, they may withdraw and become unmotivated. Hophmayer-Tokich (2013) defined information as knowledge, policy interpretation, frame of reference, and the accessibility of additional information. A person's area of knowledge and how they interpret a law or implement practices may be partially or wholly determined by their professional background and skillset. Access to information may be defined by the credentials and privileges of a position; for example, campus police officers are privy to the names of confidential victims. Challenges to statistical disclosures or proactively addressing cultural crime issues may arise at institutions where other institution personnel are responsible for campus security but do not have access to confidential police information. They are expected to handle caseloads or manage campus safety with redacted information. These conditions give plausibility to challenges such as avoiding double-counting for statistical accuracy and accurately identifying crime patterns and social trends that predicate comprehensive education and awareness. Owens (2016) added a tangible element to the definition of information, noting that the amount of documentation or whether it is altogether lacking is also an element of the construct.

According to Bressers (2004), power may be divided into control and capacity. Informal control refers to an actor's persuasive abilities, the capacity to access sources, and benefits arising from possessing advantages over others (Owens & Bressers, 2013). Formal capacity refers to an actor's authority relative to their area of responsibility, such as that delineated by legal statute. Owens and Bressers's (2013) distinction between informal and formal control is important because an actor's comprehension of power compared to others affects dynamics, and the means by which individuals are empowered through financial, temporal, and personnel resources strengthens or weakens capacity.

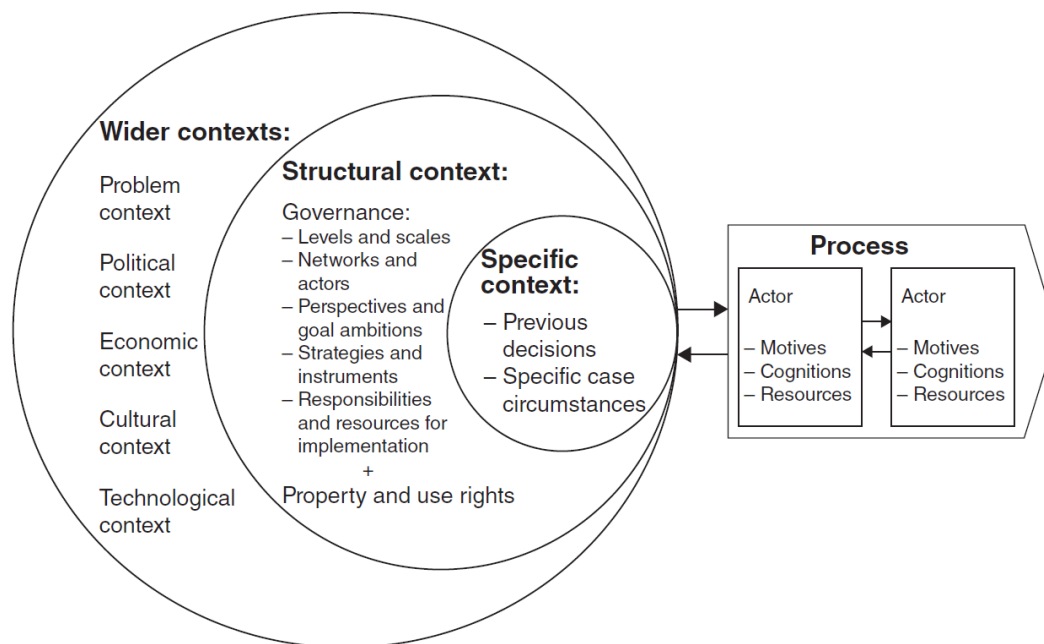
The CIT has been used primarily in environmental science and public health studies rather than in higher education. The connection between previous literature and this study is the way in which the decentralization of power tends to create an environment conducive to innovation. Studies employed multiple data-collection or triangulation methods, whether combining fieldwork data with semi-structured interviews or conducting in-depth interviews and focus groups. Mooketsi and Chigona (2016) conducted a multi-site case study with document analysis, semi-structured interviews, and observations. Kotzebue, Bressers, and Yosuf's (2010) qualitative study used semi-structured interviews, a document analysis, and a literature review. Each study used purposive sampling that drew from directly involved actors. The incorporation of triangulation strategies to increase trustworthiness or mitigate bias was paramount. This study needed to identify factors that affect implementation and investigate solutions through deductive methods. Previous studies using the CIT framework were qualitative, but varying analysis techniques inspired this study's methodology. Divergences between

coding schemes and data analysis technologies suggested no singular method to conduct a CIT framework study. It remained significant, however, to devise methods that aligned with the theory's assumptions.

Bressers (2009) contended that motivation, information, and power are influenced by institutional, network, and other factors manifesting within specific, structural, and wider contexts. Figure 1 depicts Bressers's model, which also explains existing culture and structure differences among IHEs and how those varied configurations influence policy actors.

Figure 1

Layers of Contextual Factors for Actor Characteristics



Note. From “From public administration to policy networks: Contextual interaction analysis” by H. Bressers, in S. Nahrath and F. Varone (Eds.), *Rediscovering public law*

and public administration in comparative policy analysis: Tribute to Peter Knoepfel (p. 138), 2009, PU POLYTECHNIQU. Copyright 2009 by EPFL Press. Reprinted with permission (see Appendix B).

Bressers defined specific contexts as policy inputs and points of influence and explained that structural contexts were impacted by jurisdictional, spatial, and temporal factors. Kotzebue et al. (2010) described wider context as physically and socially defined boundaries characterized by ecological, cultural, and other values. This attention to physical, social, and cultural subjectivity and cognitive belief was relevant to this study, given research suggested that these contexts impact IHE operations (Kezar & Eckel, 2002; Jones et al., 2012; Yudatama et al., 2017). Ultimately, context is the setting in which policy implementation is situated and provides internal (amongst actors involved) and external (for those evaluating or examining implementation processes) clarity regarding IHEs' networking, governance, and actions throughout processes.

The CIT framework's deductive nature aims to account for the number of conceivable ways in which motivation, information, and power can be present between actors. The theory posits situational predictions and segments itself into two aspects. The first is the likelihood of a policy instrument being applied. The second is the extent to which actors remain participatory throughout the policy implementation process. Figure 2 displays Bressers's (2009) predictive model for likelihood of application. It is a flowchart illustrating the connection between a dependent variable defined by configured independent variables. The model depicts combinations of positive, neutral, and negative motivation, information, and power among and between actors that produce active,

passive, or forced cooperation, opposition, or joint learning (see Appendix C). Active cooperation involves actors sharing common goals, whereas passive cooperation involves one actor neither impeding nor supporting instrument application. Forced cooperation is similar to passive cooperation except that a dominant actor, likely the implementer, imposes the instrument. The figure also illustrates the scale ranging from favorable to unfavorable interaction. In her examination, Owens (2008) clarified that while there are 14 outcomes, there are seven unique interactions, with 1 = active cooperation being the most favorable and 7 = no interaction considered the most unfavorable. She further clarified that the numerical identifiers for each unique interaction exist on a scale used to test the CIT formula's predictability through correlational analyses.

Figure 2

Likelihood of Application of a Policy Instrument Using the CIT

Mi	Mt	I+	Pi	Sit.	Outcome	Process
+	+/0	+	+	1	++	Cooperation (O++ → active)
			-	2	--	Learning towards 1
			+	3	++	Cooperation (forced)
			0	4	+/-	Opposition
			-	5	--	Obstruction
				6	--	None / Learning → 3
0	+	+	+	7	++	Cooperation
			-	8	--	Learning towards 7
	0/-			9	--	None
-	+	+	+	10	--	Obstruction
			0	11	+/-	Opposition
			-	12	++	Cooperation (forced)
				13	--	None / Learning → 12
	0/-			14	--	None

- Mi = Motivation implementers viz. application
 Mt = Motivation target group viz. application
 I+ = Information for application of positive partner(s) (highest level)
 Pi = Balance of power viewed from position implementer

Note. From “Implementing sustainable development: How to know what works, where, when and how,” by H.T.A. Bressers, in William M. Lafferty (Ed.), *Governance of sustainable development: The challenge of adapting form to function* (p. 295), 2004, Edward Elgar Publishing. Copyright 2004 by Edward Elgar Publishing, Inc. Reproduced with permission of The Licensor through PLSclear (see Appendix B).

Configurative hypotheses for the adequate application of a policy instrument (see Figure 3) differ somewhat from the likelihood of application because they stand to predict an instrument’s incentive value (Bressers, 2004). The types of interaction to expect are constructive cooperation, obstructive cooperation, negotiation, conflict, or symbolic application. Consistent with Bressers’s (2004) hypotheses, obstructive cooperation refers to situations in which the application of an instrument contributes negatively to one actor and negatively or neutral to another. The opposite (positive contributions from adequate application) is true for constructive cooperation. If the instrument is neutral to all actors involved, one would expect symbolic interaction. Uneven contributions through positive reinforcement for one actor and insufficient information for others also lead to symbolic application. However, team members may then learn about the policy and the process needed for implementation together. The presence of symbolic application indicates that procedures were followed with little substantive change. Negotiation involves compromise through transparent communication, and conflict involves confrontation and inimical use of power. Unlike

Figure 2, the degree of adequate application has an 8-point scale, with 1 = active constructive cooperation being the most favorable interaction and 8 = obstructive cooperation being the least favorable. A full explanation of the possible configurations according to adequate application is given in Appendix D.

Figure 3

Degree of Adequate Application Using the CIT

Mi	Mt	I+0	Pi	Sit.	Outcome	Process
+	+/0	+	+	1	++	Constructive cooperation ^a
		-		2	--?	Learning towards 1
		+	+	3	++	Constructive cooperation ^b
		0		4	+ / ++	Negotiation / Conflict
		-		5	+ / -	Negotiation
		-		6	--?	Symbolic / Learning → 3/4
0	+	+		7	++	Constructive cooperation
		-		8	--?	Symbolic / Learning → 7
	0			9	--	Symbolic
	-			10	--	Obstructive cooperation
-	+	+	+	11	+ / -	Negotiation
		0		12	+ / ++	Negotiation / Conflict
		-		13	++	Constructive cooperation ^c
		-		14	--?	Symbolic / Learning → 12/13
	0/-			15	--	Obstructive cooperation ^d

Mi = Motivation implementers viz. adequate application

Mt = Motivation target group viz. adequate application

I+ = Information for adequate application of positive or neutral partner(s)

Pi = Balance of power viewed from position implementer

^a M++ will result in an active cooperation process.

^b This will be forced cooperation.

^c This will be forced cooperation.

^d M - - will result in an active (obstructive) cooperation process.

Note. From “Implementing sustainable development: How to know what works, where, when and how,” by H.T.A. Bressers, in William M. Lafferty (Ed.),

Governance of sustainable development: The challenge of adapting form to function

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The CIT's constructs and assumptions made it the most appropriate theory for this study. Its exacting and deductive approach consolidates the complexities of IHEs into three manageable core variables and allows results to make sense within the confines of configurative hypotheses. The theoretical framework produces knowledge involving influencing factors and recognizes different purposes, functions, climates, and supports for departments under the same institution. Additionally, the CIT permits results that consider external factors, including compliance specific to when the study was conducted. For example, the Phase 1 questionnaire was disseminated during the COVID-19 pandemic. IHEs were still expected to meet Clery Act requirements during this time, so the ED issued additional guidance about emergency notifications. Though actors may differ between IHEs, program review findings and the law suggest certain positions are part of Clery Act implementation processes.

Relevant Literature

The following sections provide the context for this study's independent, moderating, and dependent variables. Background involving implementing organizations and their policy actors relates directly to the CIT by creating a frame of reference for actors responsible for Clery Act compliance and how their environments, regulating bodies, and operational purposes overlap and sometimes conflict with one another. These sections personify relevant IHE characteristics and typify the existence of CCOs and

target groups. These sections will also discuss impactful structural and wider contexts and outline Clery Act compliance to explain the study's research questions.

Implementing Organizations for Clery Act Compliance

Postsecondary education institutions are complex organizations whose economy, political power, and values are diverse and in a state of constant change (Bess & Dee, 2012). A typical organizational structure of colleges and universities includes the president's office, academic affairs, student affairs, and administration and finance, with each division characterized by subdepartments with their own operations. For example, academic affairs includes an institution's schools and colleges and may include other student services, such as admissions and academic support services. Student affairs can encompass recreation and offices dedicated to the first-year experience. Different institutions have different ways of defining their divisions based on a campus's culture and administrative preference. As an illustration, a California university holds its university police under administration and finance (California State University Monterey Bay, 2020), while an institution in Virginia has its police and public safety department subsumed under student affairs (Virginia State University, 2020).

The literature suggests private institutions offer more specialized programs and educational services, are typically nonprofit, and are relatively independent from government (Sav, 1987; Beamer, 2011; Teixeira et al., 2013). Contrarily, public institution funding relies mainly on tuition tied to student enrollment, thereby making public institutions responsible for matching consumer demands for education and service needs. Sav (1987) characterized public institutions as struggling to meet private-

educational quality and service. Furthermore, public and private institutions differ with regard to policy application. Public institutions govern themselves for the public good and therefore conduct business publicly.

White's (2003) review of the public-private dichotomy suggests some state laws do not apply, or apply differently, to private institutions. Although the Clery Act is a federal law, studies have found that judicial affairs officers at public institutions were more likely to be directly involved with the weapons-, drug-, and liquor-law violations data for annual security reports (Gregory & Janosik, 2003). Results also showed that public institutions were more likely to electronically distribute their annual security reports (Janosik & Gregory, 2003). Of note, judicial affairs is synonymous with, and the preexisting reference to, the role and function of an SCA. These statistically significant findings depict private and public IHEs compliance approach differences. By extension, they warrant examining whether private institutions' culture regarding deference to law explains contrasts between public-private Clery Act compliance strategies. White's previously mentioned comments regarding legislation distinctions are noteworthy to this study's findings. Any additional distinctions between public and private institutions' Clery Act compliance efforts or policy implementation process expand on White's (2003) suppositions.

Other differences in higher education can exist, for instance, between four- and two-year institutions. In their thematic analysis of mission statements, Wang et al. (2007) found that four-year institutions focused on education and research among colleges and universities in Texas. In contrast, two-year schools focused on vocational training and

being open-access. Fletcher and Friedel (2017) drew the same conclusion but also found that 23 states had coordinating boards for their community colleges separate from K–12 school boards and universities trustees' boards. These coordinating boards were responsible for budgeting, academics, the institution's mission, planning, and policy leadership. Despite these differences, the ED requires IHEs designate a campus safety survey administrator. Said administrators act as a liaison between the institution and the ED by submitting campus crime statistics for public disclosure. This position may or may not be responsible for the institution's compliance with the Clery Act (the CCO).

Policy Actors for Clery Act Compliance

IHEs are working to remove themselves from antiquated practices of addressing act compliance, characterized by periodic communication concentrated during select times in a calendar year. They have begun to impose a more consistent and collaborative strategy. A review of recent literature on this matter found strategic and interdepartmental collaboration is campuses' most effective means of meeting the ED's administrative capability standards and managing compliance comprehensively. Although there are no regulations in terms of which partners ought to serve on campuses' CCTs, mandates inferentially dictate general departments and offices. The flexibility afforded to institutions by the ED to devise different means of compliance permits varying interpretations of which positions are involved in Clery Act compliance.

Gregory et al. (2016) found that an employee with another predominant job function commonly handled an IHE's Clery Act compliance. They argued that having someone with the necessary expertise was critical to meeting statutory and regulatory

demands. Other observations made by the National Center for Campus Public Safety (NCCPS, 2016) included the argument that requisite knowledge and experience were vital to managing meetings and mitigating risk. The NCCPS (2016) further argued for institutional rather than collateral and intermittent responsibility and maintained a constant CCO presence systemically embedded within IHE operations reinforces compliance. A CCO can coax resistant staff into understanding the ramifications of the act and noncompliance. *Campus Safety Magazine* noted that a CCO's ability to bring departments together and recognize where and how those partners can contribute knowledge was a critical project management skill (Kiss, 2018). These recent developments regarding addressing Clery Act compliance collaboratively and programmatically contend that the CCO should serve as a campus's subject-matter expert, receive support from top-level administrators, and have appropriate autonomy and authority to develop and sustain a compliance program or address and advise on the Clery Act's programmatic elements. Campuses may regard this position as the most appropriate to advise on writing required institutional policies and procedures and act as a campus-wide training administrator. Kiss (2018) maintained that the CCO should work independently with select campus partners and possess the necessary political acumen to navigate IHE-department silos and offer effective conflict resolution. In their 2016 study, Gregory et al. found that most CCOs were employees of campus police or security departments.

The campus police connection with Clery Act compliance is strongest with regard to their calls for service and case reports. Campus police have evolved since their first

implementation at Yale University nearly 200 years ago. In most instances, contemporary campus agencies have similar arrest authority, training, and equipment to their local municipal counterparts. They address sexual violence, crime prevention, and drug education while being oriented toward community policing. Allen (2015) noted campus-policing practices protect subcommunities from the larger community because the demographic makeup of most campuses consists of 18- to 24-year-old students hailing from homogenous, middle-class, white upbringings. Campus police may revoke access to campus grounds from non-affiliates or persons otherwise not permitted to access campus facilities. Divisional VPs may also charge IHE police with responsibility for overall campus security involving infrastructure security and crime prevention through environmental design, alcohol education, and safety escorts.

Literature involving campus police functions have contradictory views about the Clery Act's effects on cross-departmental relationships. Janosik and Gregory (2003) found that the act improved crime reporting practices and the quality of campus police community programs and services. However, Woodward et al. (2016) found that university programming and disclosure compliance were inconsistent. Most institutions' efforts complied with the act but failed to address campus issues proactively. Campus police and security are critical in providing crime case information and details pertaining to incidents that prompted formal complaints, arrests, and referrals to disciplinary processes to CCOs. They also work with campus partners to notify their campus communities of serious or ongoing threats. However, because criminal reports undergo the same general processes as the criminal justice system (investigation, arrest, charging,

and adjudication), students may choose to withhold reporting victimization to campus police or security and instead reach out to other CSAs or seek resolution through the Title IX administrative process.

Under an administrative process, complaints are investigated equitably and promptly to determine whether civil rights were violated. The purpose of Title IX is to eliminate sex-based discrimination, prevent its reoccurrence, and address any effects of an incident or prevalent adverse-impact culture (U.S. Department of Education Office for Civil Rights [OCR], 2011). Title IX investigations operate under a preponderance of evidence or a clear and convincing evidentiary standard (U.S. Department of Education Office for Civil Rights, 2017) instead of beyond a reasonable doubt. Every IHE is required under federal law to have a Title IX coordinator. Their authority is supported by Title IX of the Education Amendments (1972), its implementing regulations (Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs, 2014), and the VAWA (2013).

Title IX coordinators have the authority to train others and are a point of reconciliation for ensuring accurate statistical disclosures and perhaps an avenue to providing campus communities with primary prevention programming and ongoing awareness through collaborative efforts. OPE's (2020) data generator yielded the following results: In 2018, for 6,104 institutions with 11,013 campuses, the number of reported criminal offenses was 37,573. In the same year, the number of reported arrests was 44,567, and the number of reported disciplinary actions for liquor, drugs, and

weapons-law violations was 207,383. Literature supports these data and suggests campus police deal with alcohol-related crimes more than other types of crime (Allen, 2015). It also suggests that campus sexual assaults are products of deficient policies that cultivate environments where alcohol-related crimes are likely to occur (Richardson & Shields, 2015). These environments are also influenced by the existence or absence of consent definitions, which may create conflicting goals between Title IX and campus police.

Beavers and Halabi (2017) recommended that Title IX coordinators be appropriately high in IHE hierarchies and equipped with independence and oversight authority. Title IX coordinators' responsibilities are to address sexual misconduct on college campuses comprehensively by overseeing complaints and identifying and responding to systemic problems. They are charged with meeting with students and cannot hold other campus positions that create conflicts of interest (OCR, 2011). Since Title IX coordinators are intimately involved with case details, some institutions have restricted their abilities. While they are tasked with deciding whether policy violations have occurred within a reported incident, the SCA may be tasked with determining and enforcing applicable disciplinary sanctions.

SCAs are not only responsible for sanctioning Title IX-related incidents. They also enforce an institution's student code of conduct. Most IHEs develop their student codes of conduct disciplinary systems around student engagement and discipline models. These models balance helping students acclimate to and internalize the norms of an academic community while holding them responsible for delinquent and disruptive behavior. Schrage and Giacomini (2011) argued that adjudication-only models fail to

address the assortment of issues and conflicts brought to the attention of an SCA. Under this philosophy, students miss opportunities to challenge themselves, recognize alternatives to resolve conflict, and develop new skills (Schrage & Giacomini, 2011). Studies suggest student development through deterrence is the primary purpose of student conduct and describe students finding themselves in front of an SCA for a variety of reasons ranging from exhibiting a lack of academic integrity, to violating community standards, to violating the law both on and off campus (Janosik, 2003; Shuck, 2017). SCAs, therefore, contribute another statistical element to compliance. In their seminal study of 2003, Gregory and Janosik highlighted that the Clery Act enhanced the working relationship between judicial affairs and campus police. SCAs' efficiency toward compliance efforts presupposes familiarity with requirements, knowledge of local law or ordinance violations, and identifying sources of information to track legislative changes (DeBowes, 2014; Gregory & Janosik, 2003).

For campuses whose housing has a conduct process separate from student conduct, those professionals' and paraprofessionals' responsibilities to compliance may mimic that of the SCAs. RAs are responsible for promoting academic success by enforcing institutional policy on students and serving as counselors, educational programmers, emergency respondents, and mentors inside and outside the residence hall. It is reasonable to consider the RA position as a first responder among campus housing professionals (director, community director/resident educator, operations specialist). Blimling (2014) referred to RAs as residential life's first line of defense. They are expected to address resident rules and conduct violations impartially and undergo

professional and personal development training. According to Koch (2016), training topics include leadership and community development, helping, counseling, communication, time management, conflict resolution, ethics, and professionalism. They are also trained to respond to alcohol- and drug-related matters, to listen to accounts of sexual assaults, and document building rounds or other security observations (Blimling, 2003; Letarte, 2013). Inherently, campus safety is part of an RA's responsibilities, directly affecting a campus's Clery Act compliance.

In like manner, departments with perhaps no crime classification responsibility to the act impact whether an IHE meets the ED's expectations by fulfilling its student-experience mission. Per regulation (Institutional Security Policies and Crime Statistics, 2019), noncampus geography constitutes off-campus facilities and property owned by or under a written space-use agreement with a college, university, or the institution's recognized student organizations. References to co-curriculum experiences highlight athletics, recreation, sports clubs, student organizations, and Greek life, all of which conduct various activities on and off campus. These activity departments play a critical role in institutions' commitments to retaining students by providing comprehensive support, which manifests itself in competitions, conferences, and other forms of student engagement. Stone and Petrick (2013) found that praxis involving personal and professional development often requires student travel. Travel that meets the definition of noncampus geography requires CCOs to request data from the building or property's local law enforcement agency for inclusion in campuses' annual security reports. Positions in these departments may serve on a CCT because of this connection and their

student-centered functions. By extension, positions in these departments are commonly designated as CSAs and are, thereby, required to provide crime information reported to them in their capacity as a CSA to the CCO. It is incumbent upon campuses to consider their cultures and processes to devise the easiest, most efficient ways to accomplish these tasks.

Context Considerations

Context affects all of the relationships mentioned above, and thus an institution's ability to address Clery Act compliance thoroughly. It influences the type and extent of crime campuses experience and community members' willingness to report said crime. Influential wider contexts include the nature of institutions or their principles and values that shape demographics and initiatives. Birnbaum (1989) developed four cultural typologies within higher education: collegial, bureaucratic, political, and anarchical. He posited non-hierarchical relationships characterize collegial culture; bureaucratic culture involves adherence to rules for the sake of performance; political culture involves reliance on bargaining and negotiation; and anarchical culture involves fluid decision-making when goals are vague. Components of each culture will be somewhat evident throughout every institution. Berquist (as cited in Bess & Dee, 2012) expanded on Birnbaum's theory and suggested a fifth typology: developmental culture, which involves institutions' foci on human growth and professional development for students and employees through life-long learning. The existence of such a culture is plausible, as institutions have recently begun to enact diversity initiatives and claim that varied

backgrounds and cultural competencies are critical for creating inclusive environments and preparing students for a global economy.

Surrounding political climates compound cultural contexts shaping student and employee experiences on college campuses. Since its campaigning days, the Donald J. Trump administration has been criticized as divisive and exclusionary. Its leadership has advocated for legislative repeals that threaten inclusive campus communities. In particular, Betsy DeVos, the U.S. Secretary of Education, repealed many facets of Title IX's applicability to higher education. The condemnation by women's advocacy groups represents the perspectives of sexual assault victims on college campuses who felt that the revised guidance permitted practices that would revictimize complainants and implicitly discourage students from reporting sexual misconduct. The administration's decisions demonstrated the impact of top-down policy and how target groups' responsibilities may change over time. An example of change in this context includes IHEs being required to use a preponderance of evidence standard to now choosing between that or a clear and convincing standard. Although an institution's chosen standard must remain uniform for all its processes, the ability to choose impacts how Title IX coordinators interpret and conclude factual incident information.

Another likely consequence of top-down policy is the government's expectation that civil servants or lower-ranking employees will quickly galvanize to execute a policy's outcomes. Quite the opposite is often true in higher education. IHE departments and offices tend to work in silos that provide structural context considerations regarding Clery Act compliance. The specialized nature of work in higher education fosters

isolating environments, and fragmented climates make it difficult to distribute leadership and allow campus partners to galvanize under a CCO to whom they do not report.

Underfunded or under-resourced environments bring about incentive-based compliance support and cause campuses to experience goal displacement. As Bess and Dee (2012) defined, goal displacement refers to a determination that the means of achieving legislation goals outweigh the importance of the goals themselves. Consequently, it is easier for IHEs to concentrate on departments fulfilling their own missions. Institutions focusing on traditional goals, such as recruitment, retention, attrition, and auxiliary relations, is a response to the demands of the IHE competitive environment. Bess and Dee's (2012) goal displacement assumptions are conceivable, considering more recent literature has found that institutions are forced to succumb to pressures to meet national and international political, economic, and social change (Daniel, 2015).

IHEs must acquiesce to the Clery Act and its related regulatory obligations, notwithstanding the challenges postsecondary education face amid changing times. They must grow accustomed to working through changing missions. For institutions to disclose accurate crime statistics, relationships between campus police, Title IX, student conduct, and residential life must exist, but IHEs must also define their Clery geography “regardless of its physical size or configuration” (OPE, 2016, p. 24). Clery geography refers to locations where Clery Act-reportable crimes occur and is a regulatory obligation commonly listed as a compliance pitfall. Identifying campuses’ Clery geography includes assessing changes to property acquisition and other procurement, contracts, asset management, campus police patrol jurisdictions, and student travel—changes occurring in

response to expansion, such as the physical growth of a campus or creating new community partnerships.

Literature Relevant to the Dependent Variable

Not all IHEs have to comply with the Clery Act. These exemptions include international institutions or domestic institutions that do not participate in U.S. Title IV programs, have deferment-only statuses, or are distance-education-only campuses. The number of IHEs required to comply with the act for 2018 was 6,104 (OPE, 2020). Nevertheless, the difficult task of defining compliance for IHEs changes with each amendment. For this study's purposes, compliance is defined by the HEA of 2013, its accompanying regulations, and subregulatory guidance in effect during the dissemination of the Phase 1 survey instrument (Reporting and Disclosure of Information, 2011; Institutional Security Policies and Crime Statistics, 2019; OPE, 2016). This study's definition also includes measures used by the ED to determine whether a campus achieves administrative capability. Institutions are only required to meet certain requirements if they have a police or security department or have on-campus student housing facilities (disclosures of fire statistics and safety information and procedures for missing student notifications).

These duties, as outlined in this study's compliance definition (Chapter 2), fail to illustrate the amount of work needed to complete each task, and an increasing number of studies and other literature have noted that institutions' best means of meeting the ED's expectations is through a collaborative effort between relevant target groups and implementers (Gregory & Janosik, 2002; Mills-Senn, 2013; Reicher, 2017; Stafford &

DeBowes, 2017; Sutton, 2017). Moreover, the director of the federal Clery Act Compliance Division pushed for comprehensive and institutional efforts. He encouraged campuses to be proactive, admit their weaknesses, and urged them to consider compliance outcomes as campus safety best practices that ought to exist already (Sutton, 2017). Organizations such as NACCOP, Clery Center, and Margolis Healy have developed training for IHE implementers and target groups dedicated to risk assessment to improve processes and responses. These empirically based and expert recommendations underpin the ED's administrative capability standards.

Summary and Conclusions

A review of the relevant literature identified the research problem beyond opaque issues involving whether institutions comply with the Clery Act and acknowledged impediments with measurable concern. The federal mandate is a point of contention for practitioners, and ill legislative clarity causes varying interpretations across policy implementation actors. Because requirements are tied strictly to campus safety, it is common for responsibilities to administer compliance programs to rest predominately with campus police or security departments. These methods of addressing Clery Act requirements are against best practice recommendations that call for cross-departmental and strategic collaboration. Nevertheless, it remains unclear and has not yet been empirically supported how a network affects compliance execution. This study fills a gap in the literature by providing IHE administrators with data to develop strategic initiatives. Understanding connections between policy instrument intervention and policy outcomes

required methods that gather data apropos the characteristics of IHEs, their implementers, target groups, and noncompliance. Those methods are discussed in Chapter 3.

Chapter 3: Research Method

Introduction

The purpose of this quantitative study was to expand existing knowledge of the Clery Act's effects in higher education, with particular emphasis on the impact of organizational and multi-actor group dynamics on policy implementation. The ED's student assistance general provisions (Standards of Administrative Capability, 2011) have considered the impact of context on processes but still expect institutions' outcomes to meet the definition of administrative capability. Administrative capability is a system of requirements and measures used by the ED to evaluate whether an IHE has established a compliance program satisfactorily. For higher education administrations to understand the complexities of implementing the act's policies comprehensively, it is fundamental to look beyond the act's statistical requirements and intrinsically value the theoretical and pragmatic influence of institutional responsibility on compliance. I, therefore, deliberately focused on public policy and administration rather than a broad look at the Clery Act in terms of campus safety.

The chapter focuses on this study's methodology. After presenting the study's variables and research design, populations and sample sizes are discussed. Essential to the study's validity, this chapter includes methods of recruiting participants and collecting other data. The chapter concludes by operationalizing the study's variables and addressing foreseen threats to validity and ethical concerns.

Research Design and Rationale

Upon reviewing studies that have previously used the CIT, a sequential quantitative multimethod design using a questionnaire and secondary-data content analysis was selected. By applying correlational research, predictive relationships could be identified and implications for decision-making were addressed. Practitioners believe the act's ambiguity and lack of structural support at their campuses are challenges to regulatory compliance (McNeal, 2007; Gregory et al., 2016). This design included methods that could support their perceptions and further encourage strategic action through an administrative approach. To accomplish this, the following research questions were used:

RQ1: How do actor motivation, information, and power impact CCTs' likelihood of application at IHEs?

H_{a1}: Campus CCTs' likelihood of application is more likely to experience forced cooperation if there are imbalances between motivation, information, and power.

H₀₁: There is no statistically significant difference between the likelihood of application situations campuses' CCTs encounter based on actor characteristics.

RQ2: How do actor motivation, information, and power impact CCTs' degree of adequate application at IHEs?

H_{a2}: Campus CCTs' degree of adequate application is more likely to experience negotiation or conflict if there are imbalances in motivation and information with relatively equal power between actors.

H₀₂: There is no statistically significant difference between the degree of adequate application situations campuses' CCTs encounter based on actor characteristics.

RQ3: Which characteristic (motivation, information, and power) exerts the most significant influence on institutional compliance?

H_{a3}: Of the three characteristics, power will exert the most significant influence on institutional compliance.

H₀₃: There is no statistically significant difference between the influence exerted on institutional compliance by motivation, information, and power.

The independent variables were actor motivation, information, and power. Both likelihood and the degree of adequate application are predicted process interactions based on the CIT model and served as this study's dependent variables. It was hypothesized that campuses would experience forced cooperation. Alternatively stated, there was an expectation that actor motivation and information were imbalanced, and those who were less motivated to apply their CCT were dependent on the actor's power more in favor of the CCT's application. It was also hypothesized that CCTs would experience situations where motivation and information were unequal between members with relatively equal power, leading to compromise or confrontation during the implementation process. I last hypothesized that actors' authority, persuasive abilities, and elevated or confidential access in contrast to their team members would impact noncompliance more than motivation and information. Moderating variables for each question were the institutions'

characteristics, such as whether they were public or private or the size of their student enrollments.

Understanding the CIT as it relates to the classical view of policy implementation required examination of inputs, activities, outputs, and outcomes. Conducting the Phase 1 survey alone risked failing to fill a gap in the literature by reiterating results from former research that focused on practitioner experience. Clery Act implementation actors can better grasp procedural aspects by conducting a study that incorporated practitioners' understanding of their inputs and activities and data involving already implemented policy outputs and outcomes. Implementation practitioners may also increase knowledge about their influences and, by extension, insight into how they are effectively present or absent. Expanded knowledge of where campuses should focus their compliance efforts will motivate them, considering civil penalties have steadily increased throughout the act's history and are imposable up to \$59,017 for noncompliance (Adjustment of Civil Monetary Penalties for Inflation, 2021).

Data collection and analysis did not involve describing and assigning themes to interconnected concepts as in with qualitative research. Multimethod strategies were used to overcome the weaknesses of questionnaires. Triangulation included objective views regarding interdepartmental collaboration and the scale to which it affected institutions' abilities to establish and sustain administrative capability for efficient Clery Act compliance implementation.

This design choice involved time and resource constraints in that data were collected from two sources, and analyses of those data were run separately. Compliance

with the Clery Act is multilayered and intricate. If it were separated into its many program components, each activity is arguably worth its own study. I mitigated this challenge by focusing on the CCT in an effort to amalgamate the activities of compliance that served as other studies' variables.

Methodology

Populations

There were two populations for this study: six professional associations for the Phase 1 survey design and secondary data for the Phase 2 content analysis.

Phase 1

Targeted associations included campus police and security, Title IX coordinators, SCAs, student affairs and student housing professionals, and CCOs (who may or may not also be campus police/security, a Title IX coordinator, SCA, or student affairs or housing professional). The purpose of these various associations is to provide professional development to their members with career services and networking opportunities. They are also meant to advance gender equity, diversity, and inclusion in higher education. These associations' members also share diverse responsibilities to Clery Act compliance, although most of the associations' historical purposes do not include work, training, or education related to the act. Areas of contribution and amount of time dedicated to addressing compliance vary by position and the IHE. The associations' combined membership was over 65,000. For this study, international membership was excluded from the population because the Clery Act applies only to U.S. postsecondary colleges and universities. The combined U.S. membership was 6,122 (see Table 1).

Phase 2

The ED FSA and IHEs provided the secondary data required for this study through publicly available websites. The HEA of 1965 mandates the U.S. Secretary of Education's authority to conduct program reviews. The FSA or School Participation Division of the FSA may conduct a general assessment or review with a stricter focus on campus safety. The ED FSA (2017) affirmed that the purpose of a program review is to identify liabilities, evaluate compliance, and improve institutions' capabilities. To execute their purpose, the FSA produces a concern report and provides institutions an opportunity to respond once a review is completed. The two types of concern reports are an EDL or PRR.

An EDL is a preliminary report and final determination, whereas a PRR is only a preliminary report. Institutions are obligated to respond to a PRR in writing and provide additional documentation outlining the manner in which they plan to correct compliance errors. The FPRD letter is subsequently issued and informs an institution of the ED's final determination concerning each delineated finding in the PRR along with other information, such as their civil monetary amount, payment instructions, and right of appeal information (FSA, 2017). These reviews only exist if the ED audits an institution's compliance with federal standards. They are initiated if the ED receives a direct complaint, if an institution is randomly selected to be reviewed, or if recent criminal events are prevalent within the media. They may also occur in conjunction with a financial aid audit or FBI UCR quality assurance audit through a campus's police department (D. Stafford, personal communication, April 11, 2019).

The documents were reviewed to determine the correct population. Duplicate publications on the ED site and reviews that yielded no compliance findings were excluded. EDLs and PRRs were included in the population only if there was no FPRD. If there was both a PRR and an FPRD with sustained findings made publicly available, the PRR was not kept. However, a PRR was kept if an institution was determined to have resolved all original findings in its FPRD. Data collection for this study was discontinued on March 15, 2021. In all, this study utilized 122 published Clery-focused program reviews (see Table 2) ranging from 1997 to 2019 (a 2003 review was multi-part, but this study calculated it as one report in the population since each part was for an institution under the same university system). Reviews were grouped by their last year reviewed, not by their publication date.

Sampling and Sampling Procedures

The study's confidence and significance levels for each phase were supported by instructional and research literature. Owens and Bressers (2013) and Gregory et al. (2016) recognized the standard alpha ($\alpha = .05$). The former found that the CIT was a strong predictor for conflict experienced in participants' policy implementation processes. While Gregory et al. (2016) examined the status of the CCO position at institutions nationwide using a stricter statistical significance ($\alpha = .001$), it was appropriate to model the 5% significance level after studies that used the same theoretical framework.

Effect sizes were modeled after conventional standards, which considers small, medium, and large effect sizes for independent samples *t*-tests and ANOVA, $d = .02$, $d =$

.50, and $d = .80$ and $\eta^2 = .01-.06$, $\eta^2 = >.06-.14$, and $\eta^2 = >.14$, respectively (Martin & Bridgmon, 2012). Both phases' samples were determined using Israel's (1992) explanation of Cochran's formula with a finite population correction for proportions and checked for accuracy using SurveyMonkey's (2019) sample-size calculator.

Phase 1

Sampling procedures needed to generalize findings across the population. For this reason, a proportional stratified random sampling technique was chosen. It was the most practical way to ensure representation within each stratum and reduce overall variance. Of the total population ($N = 6,122$), 362 respondents in the sample and the following minimum number of respondents from each association were needed: 31 from Association A, 77 from Association B, 49 from Association D, 148 from Association E, and 66 from Association F. Association C did not disclose its membership total and was removed from the population. Using a proportional random sampling technique had its drawbacks. Participants may have overlapped subgroups, and all targeted associations had the option not to participate. The first concern was circumvented by having custom questionnaire URLs to collect responses separately by stratum. If a participant belonged to more than one association and received multiple invitations, they were provided an opportunity to ignore subsequent invitations. The second concern was addressed by adjusting sampling calculations so that each stratum's minimum number of respondents was met if any association did not participate. Any participant who failed to provide informed consent was excluded from the study. Participants were also excluded if they

answered affirmatively to the questionnaire's disqualifying questions (whether they worked at a deferment-only status campus or a distance-education-only campus).

Table 1

Populations of Professional Associations by Membership Type

Identifier	U.S. IHE Strata Group Totals
Association A	530 (membership services coordinator, personal communication, December 2, 2019)
Association B	1,300 (senior director of data analytics, personal communication, July 10, 2018)
Association D	836 (director of member engagement, personal communication, July 8, 2018)
Association E	2,500 (vice president for client and member services, personal communication, July 9, 2018)
Association F	956 (member services representative, personal communication, July 9, 2018)
Population (<i>N</i>)	6,122

Note. The Association A total does not include my institutional membership, which would have made the total 531. IHE = institutions of higher education.

Phase 2

Inclusion and exclusion criteria were predetermined by defining the population. After ascertaining whether to include an EDL, PRR, or FPRD, the sample needed 93 total documents. Using a quantitative content analysis required probability sampling that benefited from the same advantages in Phase 1 to ensure external validity. The disadvantages, however, were not applicable. While the same institution may have been reviewed in multiple years due to different issues or complaints, there were no duplicate reviews within the population. Proportional stratified random sampling determined that the following minimums for each of the 22 years within the strata were needed: 3 (1997),

1 (1998), 2 (2000), 2 (2001), 2 (2002), 1 (2003), 2 (2004), 2 (2005), 2 (2006), 1 (2007), 2 (2008), 6 (2009), 5 (2010), 15 (2011), 7 (2012), 6 (2013), 9 (2014), 11 (2015), 2 (2016), and 9 (2017), 2 (2018) and 2 (2019).

Table 2

Population of Clery Act-Focused Determination Reviews

Year	Number of Published Letters	Percentage of Total Population
1997	4	3.28%
1998	1	0.82%
2000	2	1.64%
2001	2	1.64%
2002	2	1.64%
2003	1	0.82%
2004	3	2.46%
2005	3	2.46%
2006	2	1.64%
2007	1	0.82%
2008	2	1.64%
2009	8	6.56%
2010	6	4.92%
2011	20	16.39%
2012	9	7.38%
2013	8	6.56%
2014	12	9.84%
2015	15	12.30%
2016	3	2.46%
2017	12	9.84%
2018	3	2.46%
2019	3	2.46%
Population (<i>N</i>)	122	100%

Procedures for Recruitment, Participation, and Data Collection

Two populations and two samples required two procedures for data collection.

The targeted associations' executive boards were emailed (see Appendix E) during Phase 1. Requests included contacting their membership on my behalf and disseminating the questionnaire, but I received little cooperation. Association A was the only association to agree (see Appendix F) and email their members an invitation to take a SurveyMonkey questionnaire (see Appendix G). Potential participants were presented with an

introductory informed consent and privacy statement (see Appendix H) after clicking on the questionnaire's link. They were able to begin the survey after providing their electronic consent. Any participant who failed to consent was closed out and redirected to the disqualification page (see Appendix I).

SurveyMonkey did not have a feature for respondents to print sections of the online survey (Pauline, personal communication, June 25, 2018). However, any respondent who wanted a copy of the consent statement and privacy policy for their records was redirected via hyperlink to Outlook's SharePoint Online, a cloud-based file-sharing platform.

Respondents were unable to access and edit their responses once the questionnaire was submitted. They could end the survey at any time. Whether partially or wholly completed, participants were met with a survey end page (see Appendix J) after submitting. Respondents partially completed the survey if they responded to at least one question and clicked "next" but either did not select "done" or exited their browser during the survey. Those that selected the "done" button at the end of the survey completed the questionnaire successfully.

Respondents were asked about their categorical institutional characteristics (whether the institution was public or private; its enrollment size to determine whether it was small, mid-size, or large; and whether their campus had on-campus student housing or a study-abroad program). These questions could be answered with fewer burdens to participants by collecting their email addresses and using that information to search a campus's demographical information using the ED's National Center for Education

Statistics College Navigator. Nevertheless, collecting personally identifiable information presented ethical issues, which are discussed further under Ethical Procedures. Follow-up procedures for questionnaire respondents were not necessary.

No permissions were needed for Phase 2 data collection because the Clery Act is a consumer-protection law. Secondary data was obtained via publicly accessible websites. Demographically categorical data (institutional sector and enrollment size) were collected as disclosed in the sampled review and used to test against continuous dependent variables (number of Clery-focused findings). These documents held the official ED seal and included a federal audit control number.

Instrumentation and Operationalization of Constructs

Phase 1

Instrumentation was adapted from Owens (2016), who used the CIT to explore actor characteristics and their effects on policy implementation. Her findings discussed policy decision-making and effective governance among conflicting interests using a case-study methodology. Owens (2008, 2016) provided conceptualizations for each independent variable that aligned with previous literature. This study operationalized the CIT variables the same as Owens. Motivation constructs include self-interest and external pressures, both of which either encourage or stifle process participation. Motivation is categorized as self-motivation and wider factors, which according to Bressers (2009), exert indirect yet impactful influence on an actor's willingness to participate in the policy implementation process. Participants were, therefore, asked about their compatibility with implementers' compliance goals and political influence. Information was divided into

general knowledge and transparency of information among those involved. Additionally, power was separated into capacity and control. Capacity included resources that strengthened or weakened an actor's position, and control represented any legal and organizational reinforcement of an actor's authority. Table 3 outlines the conceptualization of each independent variable for this study. See Appendix K for an explanation of how these conceptualizations were operationalized within the study's instrument.

Table 3

Conceptualization of Independent Variables Using the CIT

Motivation	Information	Power
<i>Self</i>	<i>General Information</i>	<i>Capacity</i>
Compatibility with implementation goals	Policy awareness	Resources
Work-related motivation	Policy requirements	Lack of Resources
Attitude toward other stakeholders	Policy benefits	
Attitude toward the program objective	Knowledge of stakeholders and qualifications	
Self-effectiveness		
<i>Wider</i>	<i>Transparency</i>	<i>Control</i>
Normative	Documentation, including lack of	Formal
Cultural	Accessibility, including lack of	Informal
Social	Process complexities, uncertainties	Reputation of Power
Political		

A 43-item questionnaire (see Appendix H) was created using Owens's (2016, Tables 5.2-5.4) sample questions and adapted to fit this study. The questions were first developed in Owens's (2008) doctoral dissertation and republished in a second study conducted by Owens and Bressers (2013). All three studies were a comparative analysis of wetland restorations. This study's modifications of their work reflect actor and context differences between Clery Act compliance in higher education and environmental policy. For example, Owens (2016) asked, "Would you describe any of the stakeholders as being

targeted by this project (positively or negatively)?" (p. 90). The question was changed to, "In your opinion, how are the following campus partners impacted by the implementation of a CCT (i.e., whose processes will improve and who will be burdened)?"

Avoiding making any substantive changes to the original instrument maintained this study's modified version's predictive and constructive validity. A pilot study was not conducted to test the instrument and its measurement protocols, given the timing of the study. I had concerns of increased difficulties regarding whether respondents would participate during the holiday season when campuses were managing temporary closures and student move-out, followed by move-in for the spring semester. However, strategies were undertaken to evaluate the degree to which the questionnaire supported the appropriateness of the inferences based on respondents' scores. Messick (1989) affirmed that validity was not all or nothing but a matter of degree. In the absence of a pilot study, the Clery Center was contacted to review the general logistic nature of the questionnaire and provided feedback, which I applied to enhance clarity for the reader. Owens, the original instrument's developer, also reviewed the appropriateness of the questions' modifications. Both these strategies aimed to achieve a degree of validity. The questionnaire itself was content-relevant and included other vital construct validity aspects described by Messick (1989), such as rational construct-based scoring criteria and score interpretations that referred to content and operative processes across tasks, settings, and occasions.

The questionnaire's introduction outlined the research context. It provided a general description of the questions, the approximate time needed to complete them, and

a disclaimer that responses could not be edited once the questionnaire was submitted. The questionnaire was broken into three sections: The first 10 questions asked about respondents' institutions' demographics. The following 10 questions measured the likelihood that campuses would administer their CCTs, and the final 23 questions measured respondents' and their team members' participation in their campuses' CCTs. There were 13 points of assessment for motivation, 10 for information, and 10 for power between these dependent variables.

Scoring replicated previous researchers' means of calculation (Owens, 2008; Owens & Bressers, 2013). I gave respondents positive (+) or negative (−) scores for each response that indicated they were for or against the implementation of their CCT. The resulting proportion was subtracted by 0.50 to account for any potentially existing negative motivation, modifying the scale to −0.50 to +0.50, and then multiplied by two. In the end, respondents were identified as having negative (−1.00 to −0.21), neutral (−0.20 to +0.20), or positive (+0.21 to +1.00) motivation on a scale of −1.00 to +1.00. For example, if a respondent were positively motivated for 10 of 13 questions, their score would be calculated as follows:

$$\begin{aligned} 10/13 &= .77 \\ 0.77 - 0.50 &= .27 \\ 0.27(2) &= +.54 \text{ (positive motivation)} \end{aligned}$$

Owens and Bressers (2013) emphasized that there are levels of information (no knowledge versus much knowledge or minimal amounts of transparency versus a great degree of transparency) and calculated said levels on a scale from 0.0 to +1.0. Continuing to replicate the literature's calculation methods, I gave responses to questions measuring

information positive and negative scores. However, I did not transform them in the same way as motivation. The result remained a proportion of two ratios: the number of positive responses compared to the total number of questions. For instance, if a respondent answered six of 10 questions in a manner that indicated awareness, accessibility, and familiarity, they would receive a score of .60. Information scores are interpreted in the CIT as having either sufficient or insufficient amounts to effectively implement a policy instrument or keep target actors incentivized throughout the implementation process (Bressers, 2004). For this study, these values were .00–.50 (insufficient) and .60–1.0 (sufficient). Though calculated, information values could not definitively narrow the predicted likelihood of application and adequate application process interactions because the most motivated actor could not be determined with results from one association, thereby preventing a lack of comparison.

Similarly, power values could not be determined for this study. Calculations were dependent on participation from at least one other professional association (B, D, E, or F). Without a power score from any group besides Association A, a comparison between its members' perceived power and the perceived power of their colleagues remains unknown. Typically, power values undergo slight variation from their scaled proportion (0.0 to +1.0) because it represents an even or uneven balance (Owens, 2008; Owens & Bressers, 2013). For this study, values would have represented a power difference between implementers and target groups. A difference score of 0.0 to 0.14 would have indicated a balance, whereas a higher score would have determined that one actor had more power than the others (Owens, 2008; Owens & Bressers, 2013). Some responses

were open-ended and given a + or – score based on the response. For a detailed account of which questionnaire responses were positive (+) and negative (–), see Appendix L.

Continuous values produced for the motivation variable were evaluated through the likelihood of application (Chapter 2, Figure 2) and degree of adequate application (Chapter 2, Figure 3) flowcharts to predict process interactions.

Phase 2

A deductive coding scheme (see Table 4) drew from the CIT framework and used its concepts as units of analysis in a custom computer-aided text analysis dictionary. The scheme included reliable and valid indicators expressing four broad categories (motivation, information, power, and finding) that represented the third hypothesis's independent and dependent variables. The devised words and phrases were conceptualizations for each category that paralleled the questionnaire or resulted from a preliminary frequency count of words and phrases within the population.

The key-in-context function in WordStat 8.0 tested the validity of the coding scheme. Singular words were modified to phrases to achieve at least 80% true positives or were otherwise removed. For example, the information category originally included the word “accessible” to measure transparency. However, the item was removed since it frequently referred to the regulatory definition of public property, which is, “All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus” (Institutional Security Policies and Crime Statistics, 2019, p. 427). The scheme needed to balance

providing neither too much nor too little detail for future research replication. For the complete coding scheme, see Appendix M.

Table 4

CATA Coding Protocol for Exploring Clery Act-Focused Program Reviews

Category	Code Word or Phrase		
Motivation	Leadership	Purpose	Support
	Administrative Failures	Participate	Priorities
	Goals	Willingness	Coordination
	Incentive	Commitment	Priority
	Values	Collaboration	
Information	Knowledge	Clarity	Training
	Adequate	Accuracy	Communication
	Documentation	Reliant	MOU
	Qualified	Relationship	Interpretation
	Understanding	Internal Controls	
	Institutional training, oversight, and supervision The Department also provides a number of other Clery Act training resources		
Power	Checks and Balance	Capacity	Ownership
	Resources	Clery Coordinator	Personnel
	Supervision		
Finding	Violations	Deficiency	Weakness
	Corrective Action	Deficient	Improve
	Failure	Discrepancy	Discrepancies
	Impose	Inaccurate	

Note. CATA = computer-aided text analysis.

Data Analysis Plan

Phases 1 and 2 were distinct, but both data sets were analyzed using the Statistical Package for the Social Sciences (SPSS). The second phase was analyzed first through WordStat 8.0 to identify keyword and phrase frequencies and build graph representations from those data. Several statistical tests were used across both data sets. No test applied a

Bonferroni correction because the study's limitations mitigated the risk of false positives. A lack of participation in Phase 1 left a single independent variable against a single dependent variable. Moderating variables in both phases were run separately, and the multiple independent variable computations for Phase 2 were run against a single dependent variable separately. Statistical tests included chi-square test of independence, bivariate correlation, independent samples *t*-test, regression, and ANOVA. These tests were accompanied by assumptions (see Table 5) that required post-hoc testing and additional actions if the assumptions were violated.

Table 5

Statistical Assumptions Relevant to the Study

Statistical Test	Assumptions
Cross-tabulation (chi-square test of independence)	Two categorical variables with two or more independent groups
Bivariate correlation	Pearson: Two continuous variables with a linear relationship that are normally distributed and do not suffer from significant outliers Spearman: Two ordinal or continuous variables that have paired observations and a monotonic relationship
Independent samples <i>t</i> -test	A continuous dependent variable and a categorical independent variable with independent observations and no significant outliers
Regression	Linear: Two continuous variables with a linear relationship, no significant outliers, independent observations, a normal distribution and homoscedasticity Multiple: A continuous dependent variable and two or more categorical or continuous independent variables with an independence of observations, linear relationship, no significant outliers, multicollinearity, and homoscedasticity that is normally distributed
ANOVA	A continuous dependent variable and an independent variable with two or more independent, categorical groups that have an independence of observations, and homogeneity of variances

Note. This chart included surmised and consolidated content taken from Szafran (2012) and Frankfort-Nachmias and Leon-Guerrero (2015).

The cross-tabulations performed in Phase 1 did not require prerequisite or post-hoc analysis because its assumptions do not include population distribution. A Levene's test was used to assess for variance between Phase 2 data, but homogeneity of variances was not violated. Assessing for irregular data distribution for correlation and regression analyses performed in both phases required using the Kolmogorov-Smirnov and Shapiro-Wilk normality tests (Ghasemi & Zahediasl, 2012). Non-normal data reported medians and interquartile ranges instead of means and standard deviations. Incomplete surveys were not withheld from data analyses because calculating scores was proportion-based, although missing responses were withheld. Missing cases for all statistical tests were excluded pairwise.

Phase 1

Questionnaire responses were screened and subsequently prepped for data analysis. Sectors were consolidated into two groups (public and private) from the initial nine (public, 4-year or above; private, non-profit, 4-year or above; private, for-profit, 4-year or above; public, 2-year; private, non-profit, 2-year; private, for-profit, 2-year; public, less-than-2-year; private, non-profit, less-than-2-year; private, for-profit, less-than-2-year). Open-ended responses were given values that maintained integrity for respondents' perspectives. Conversions of this nature required knowledge of the questions' goals and a foundational understanding of effectuating a networked Clery Act compliance program. No open-ended responses were lengthy, which would have required iterative refining to interpret whether they were positive or negative correctly. Wherever possible, written responses that reflected given choices were merged with a multiple-

choice answer, and similar open replies were collapsed to a single SPSS value. For example, Question 41 asked respondents to describe their contribution to their institution's Clery Act compliance efforts if there was no financial commitment. One respondent wrote, "Paid out of my Security budget." Their response merged with the multiple-choice option to Question 40, "yes, out of my department's budget." Other written responses included, "All Clery compliance is coordinated through my position" and, "Managerial and Administrative Oversight." They were collapsed into a "managerial and administrative oversight" value. Question 41 also included the response, "Training and collaboration with stakeholders," which was given a neutral score because it was unclear whether the respondent led the training and collaboration or simply participated.

Question 34 did not receive a score. Neither the combination nor the number of selections implied the existence of positive, negative, or neutral power. Combinations that were positive for one respondent may have represented neutral or negative power for others. Interpretation within this ambiguity would have risked false results.

Phase 2

Preparation for this phase involved fewer steps than Phase 1. FRPDs were reviewed for formal linguistics and semantic relationships that produced implicatures institutions could understand and later use toward future compliance efforts. The following page information was removed using Adobe Acrobat Pro DC because it did not provide the content needed for analysis: cover letters, introductory background information, civil monetary penalty payment instructions, summaries of liability, costs of funds worksheets, and document review-list appendices. Pages related to joint audit

efforts, such as findings from a financial aid audit, were also removed. The remaining text was the ED's findings related to Clery Act compliance, which was converted into optical character recognition for easier pattern recognition and text mining using Wondershare PDF Element.

Threats to Validity

The survey was administered in late 2019 after campuses published their annual security reports and submitted their statistics to the ED. The outcomes of their policy process interactions were recent and respondents' perceptions of events influenced how they answered the questionnaire and, by extension, impacted their motivation scores. Although this study's instrument was developed from a previous research instrument, I determined positive and negative responses. My knowledge, skills, and experience as a CCO may have impacted formulating the study's hypotheses. However, being a member of Association A presented no advantages that posed further bias-related threats to the validity of this study. I communicated with the association in the same manner as with the other potential partnering organizations and communicated with their membership no differently (through the association using the same templated communication, Appendix G). Furthermore, the interpretations of the study's findings were the results of statistical analyses based on questions, keywords, and phrases that were developed from previous studies.

These counterbalance measures, however, could not mitigate other validity issues. Lack of participation affected the study's ability to generalize its findings and test the full predicting ability of the CIT framework in Phase 1. Rather than identify a specific

process interaction, the Phase 1 results included various situation possibilities. Threats to Phase 2's construct validity involved including or excluding words and phrases with varying interpretations among readers.

Ethical Procedures

This study adhered to Walden University's Institutional Review Board's (IRB) ethical guidelines for participant recruitment and selection, data collection, privacy, informed consent, and addressing risk. Upon approval, the study was issued the following IRB identifier: 08-23-19-0613926, which expired August 22, 2020.

Solicited information used cookie data permissible under SurveyMonkey's (2019) Privacy Policy. Electronic copies of responses were secured in a password-protected SurveyMonkey account. Paper copies of questionnaires were locked in storage, and the analyses' electronic files for both phases were secured on a password-protected cloud-based system. All information will be stored for 5 calendar years. Associations' names remained masked when discussing participants, and general descriptors were used when presenting results. Details that may have identified institutions or their employees were not shared or used, and communication with partnering associations was honest, respectful, and non-coercive.

Association A's informed consent form (see Appendix H) stated that respondents' participation was of their own volition. It disclosed the purpose of the study, the study's risks and benefits, confidentiality, and conditions for participation. Neither the study nor Association A targeted vulnerable populations, and the study did not involve data-collection processes that posed risks to physical health. Nevertheless, administering the

survey included a potential risk of participants reflecting on current work practices. It may have prompted conversations with campus colleagues or assessments of team effectiveness. Respondents could have refused participation or withdrew from taking the questionnaire without consequence.

This study also posed ethical considerations to my positionality. As a CCO, study participants may have included familiar colleagues. Nevertheless, this study sought to present valid truth despite this conflict of interest. Impartiality was encouraged by structuring the questionnaire to accept anonymous responses. Respondents' personal information, such as first name, last name, IP address, and email address, was not collected.

Summary

Chapter 3 outlined the study's methodology in terms of its research questions and hypotheses. This chapter also discussed data collection, sampling protocols, instrumentation, operationalization, and ethical considerations for the sequential quantitative multimethod design. Phase 1 demanded strict adherence to the ethical procedures as set forth by Walden University's IRB. Threats to validity were addressed proactively, thereby allowing objective and succinct results to align with the research problem and providing viable public policy and administration recommendations. Chapter 4 explains the results of the juxtaposed data analyses.

Chapter 4: Results

Introduction

Although there has been a considerable amount of seminal research conducted on the Clery Act, the literature has not exhausted the issues related to compliance. Therefore, I focused on institutions' inability to administer a Clery Act compliance program adequately. The purpose of this quantitative study was to expand the knowledge of the Clery Act's effects in higher education using a public policy and administration lens to examine relationships between compliance-practitioner characteristics, organization dynamics, and compliance variables. Data collection and analysis were conducted in two phases. The Phase 1 research questions were formulated to understand associations and interrelations between policy actor characteristics, the likelihood of applying CCTs, and interactions experienced while participating in Clery Act policy implementation. The Phase 2 research question was devised to understand which factor-dynamic explained documented noncompliance. The hypotheses predictions included forced cooperation, negotiation, conflict, and that power would affect institutions' ability to comply with the act more than motivation and power. These expectations are predicated on previous literature findings and their recommendations for strategic and cooperative managerialism.

This chapter includes the data collection process and details regarding sampling challenges as well as the study's results.

Data Collection

Although I initially intended to partner with six IHE professional associations, only one took part in this research. The questionnaire (see Appendix H) was accessible to Association A for 17 weeks via an invitation (see Appendix G) sent by an organization director. The same director sent the same email as a follow-up reminder 31 days after the initial invitation. During those 17 weeks, open invitations were also made through Facebook to garner participation (see Appendix N) from remaining associations where the initial request to partner in this research remained unanswered. Participants were asked to solicit their perspectives about their institution's foundational support and campus's cross-departmental interactions involving Clery Act compliance. After 17 weeks, data collection was discontinued. Data collection for Phase 2 of the multimethod took 2 days and went as planned.

Sampling Challenges

The Cochran formula with a finite population correction for proportions was used to determine that 362 respondents were needed to conduct the study with three independent variables, two dependent variables, and six groups. Association B indicated that they did not distribute surveys on behalf of researchers at the time of the request, nor did they provide member email addresses. Associations C and D required separate submissions to their IRBs. Though I completed both associations' IRB applications, Association D never provided feedback, and Association C requested substantive revisions to the survey instrument. Association C's request included concerns that the entire membership was not the target audience and that, consequently, questions would

be difficult for respondents to answer. While their expressed concerns were justifiably pragmatic, the purpose of the instrument and sample was based on theory and professional culture. Though the responsibility to administer a compliance program rests predominately with campus police and security (Gregory et al., 2016), some subgroups contribute. Positions within those subgroups are varied, and they participate in various ways. This research was intended to identify the amount and type of interconnected participation between each subgroup. Therefore, the instrument could not be compromised. For the remaining three organizations, it is unclear why they chose not to support the research. There were other methods available to garner respondent participation, and on February 5, 2020, a revised IRB application was submitted.

Invitations were posted on the Facebook pages of Organizations B, D, and F. A post to Association E's Facebook page was not possible, but a direct message requesting permission was sent. No respondents participated as a result of these attempts. Posts remained on said associations' Facebook pages for 18 days before closing their surveys. Additionally, a seventh partnering organization, Association G, was contacted and received the same request (see Appendix E). While there was initial interest, the organization did not state whether they would send the survey to their membership.

It was suspected that COVID-19 impacted the willingness or ability of people to participate in the study. In higher education, institutions throughout the nation closed their doors, sent students and employees home, and activated their emergency operation centers. State attempts to slow the spread of COVID-19 changed Americans' everyday life. The uncertainty and isolation, along with the emotional responses of depression,

fear, and anxiety, may have caused this study to receive low priority. The low sample size warrants empirical testing in future research. There was a reasonable expectation that these associations would want to contribute to research examining collaborative partnerships involving higher education policy.

Descriptive and Analytic Results

Phase 1

Sampling challenges failed to yield the number of respondents necessary to make inferences about compliance networking. The number of respondents ($n = 59$) also failed to exceed the modified sample size needed ($n = 223$) to generalize findings across Association A.

Demographic Data

Beginning questions asked respondents about the number of students receiving federal aid (Table 6), their institution sector and setting (Table 7), student enrollment (Table 8), and whether their institution had on-campus student housing or a study-abroad program (Table 9). Each demographic table includes the number of observations and valid percentages that fell into each category for a specific variable. Most of the respondents ($n = 46$) worked at institutions where at least 50% of students received financial aid (see Table 6).

Table 6*Percentage of Students Who Receive Title IV Federal Student Aid*

Amount of Federal Aid	Frequency	%
25%–49%	7	13.2
50%–74%	23	43.4
75%–100%	23	43.4
Total (<i>n</i>)	53	100.0

The majority of the respondents worked at public institutions ($n = 41$, 69.5%). Five of seven (8.5%), nine of 10 (15.3%), seven of 15 (11.9%), and 20 of 27 (33.9%) reported working at public/rural, public/town, public/suburban, and public/city campuses, respectively (see Table 7). Whether at a public or private institution, 45.8% ($n = 27$) of respondents reported working in a city setting; 25.4% ($n = 15$) reported working in a suburban setting; 16.9% ($n = 10$) reported working in a town setting, and 11.9% ($n = 7$) reported working in a rural setting.

Table 7*Comparison of Campus Setting and Institutional Sector*

	Institutional Sector		Total
	Public	Private	
Rural	5	2	7
% within Rural Setting	71.4	28.6	100.00
% of Total	8.5	3.4	11.9
Town	9	1	10
% within Town Setting	90.0	10.0	100.00
% of Total	15.3	1.7	16.9
Suburban	7	8	15
% within Suburban Setting	46.7	53.3	100.00
% of Total	11.9	13.6	25.4
City	20	7	27
% within City Setting	74.1	25.9	100.00
% of Total	33.9	11.9	45.8
Total (<i>n</i>)	41 (69.5%)	18 (30.5%)	59 (100.0%)

Approximately 61% ($n = 36$) also worked at campuses with $\leq 13,999$ students (see Table 8). According to the National Association for College Admission Counseling (n.d.), small institutions have fewer than 5,000 students, mid-size institutions have between 5,000 and 15,000 students, and large campuses are considered enrollments with over 15,000 students. The results found 22.0% ($n = 13$) of respondents were from a small campus. Approximately 38.9% of the respondents worked at medium institutions with total enrollment ranges of 5,000–9,499 ($n = 13$, 22.0%) and 9,500–13,999 ($n = 10$, 16.9%). A number of respondents reported working at large institutions with either 18,500–22,999 ($n = 3$, 5.1%), 23,000–27,499 ($n = 7$, 11.9%), and $\geq 32,000$ ($n = 9$, 15.3%) student enrollments. Four respondents could not be categorized because the total headcounts of their institutions (i.e., 14,000–18,499) overlapped the mid-size and large categories. The same number of respondents reported working at institutions with on-campus student housing and study-abroad programs ($n = 48$, 81.4%) (see Table 9).

Table 8

Student Enrollment by Headcount (Including Multi-Campus IHEs)

Number of Students	Frequency	%
< 500	1	1.7
500–4,999	12	20.3
5,000–9,499	13	22.0
9,500–13,999	10	16.9
14,000–18,499	4	6.8
18,500–22,999	3	5.1
23,000–27,499	7	11.9
32,000 and greater	9	15.3
Total (n)	59	100.0

Note. IHEs = institutions of higher education.

Table 9*Institutions with On-Campus Student Housing and Study-Abroad Programs*

Characteristic	Yes		No	
	<i>N</i>	%	<i>n</i>	%
Housing ^a	48	81.4	11	18.6
Study Abroad	48	81.4	11	18.6

^a On-campus as defined in Reporting and Disclosure of Information (2011).

These demographic data were used to explore relationships between institutional setting, sector, and whether campuses had a CCO (see Table 10). Of the 49 that answered the question, most respondents ($n = 45, 91.8\%$) had a designated CCO regardless of campus setting or institutional type. However, most CCOs ($n = 16$) were reported at public/city schools. The relationships between institutional sector and having a CCO ($X^1 = 0.27, p = .869$) and campus setting and having a CCO ($X^3 = 1.78, p = .619$) were not statistically significant.

Table 10*Comparison of Sector and Setting with a CCO*

Institutional Sector/Setting			Clery Compliance Officer		Total
			Yes	No	
Public	Rural	Count	4	0	4
		% within Rural	100.0	0.0	100.0
		% of Total	11.4	0.0	11.4
	Town	Count	7	0	7
		% within Town	100.0	0.0	100.0
		% of Total	20.0	0.0	20.0
	Suburban	Count	5	0	5
		% within Suburban	100.0	0.0	100.0
		% of Total	14.3	0.0	14.3
	City	Count	16	3	19
		% within City	84.2	15.8	100.0
		% of Total	45.7	8.6	54.3
Total	Count	32	3	35	
	% of Public Total	91.4	8.6	100.0	
Private	Rural	Count	2	0	2
		% within Rural	100.0	0.0	100.0
		% of Total	14.3	0.0	14.3
	Town	Count	1	0	1
		% within Rural	100.0	0.0	100.0
		% of Total	7.1	0.0	7.1
	Suburban	Count	4	1	5
		% within Suburban	80.0	20.0	100.0
		% of Total	28.6	7.1	35.7
	City	Count	6	0	6
		% within City	100.0	0.0	100.0
		% of Total	42.9	0.0	42.9
Total	Count	13	1	14	
	% of Private Total	92.9	7.1	100.0	

Note. Cross-tabulation analyses. CCO = Clery Compliance Officer.

A second exploration revealed that one-third of participants who reported working at a campus with a CCO also reported the position as being full-time and dedicated (see Table 11). Examining these data further found the relationships between CCO commitment and institutional sector ($X^2 = 3.27, p = .195$) and CCO commitment and campus setting ($X^2 = 3.04, p = .804$) were not statistically significant.

Table 11*Comparison of Campuses with a CCO and Commitment Level*

Commitment		Clery Compliance Officer		Total
		Yes	No	
PTC	Count	11	3	14
	% within PTC	78.6	21.4	100.0
	% of Total	22.9	6.3	29.2
FTC	Count	18	0	18
	% within FTC	100.0	0.0	100.0
	% of Total	37.5	0.0	37.5
FTD	Count	16	0	16
	% within FTD	100.0	0.0	100.0
	% of Total	33.3	0.0	33.3
Total	Count	45	3	48
	% of Total	93.8	6.3	100.0

Note. Cross-tabulation analyses. PTC = part-time, collateral duty. FTC = full-time, collateral duty. FTD = full-time, dedicated position. CCO = Clery Compliance Officer.

Contextual Interaction Theory Variable Analysis and Hypotheses Testing

Fifty-nine respondents answered nine questions to calculate their likelihood of application motivation scores. The produced value (see Table 12) was funneled through the CIT's likelihood of application flowchart (Chapter 2, Figure 2) to answer RQ1, which was as follows:

RQ1: How do actor motivation, information, and power impact CCTs' likelihood of application at IHEs?

H_{a1}: Campus CCTs' likelihood of application is more likely to experience forced cooperation if there are imbalances between motivation, information, and power.

H_01 : There is no statistically significant difference between the likelihood of application situations campuses' CCTs encounter based on actor characteristics.

Table 12

Likelihood of Application Scores by Mean

Aspect	CIT Independent Variables		
	Motivation	Information	Power
Likelihood of Application	-.29 (63/147)	+.38 (223/498)	+.52 (61/97)

Note. $n = 59$. The power value is not a score difference. CIT = contextual interaction theory.

CCOs reported experiencing negative motivation (-1.00 to -0.21). Although the produced information and power scores could not be used with a single surveyed association, observed process interactions involved obstruction, opposition, forced cooperation, joint learning, or no interaction (see Table 13). The situation was found to be as predicted, leaving further examination of statistical significance between the variables.

The median motivation score ($Mdn = -.33$, $IQR = 1.33$) determined their CIT likelihood of application outcome ($Mdn = 1.00$, $IQR = 1.00$). A Pearson's correlation was run using a dummy variable (1 = negative and 0 = positive) for the process interaction since the observed motivation scores for each respondent led to a positive or negative situation. These data revealed a strong, negative linear relationship that was statistically significant ($r = -.919$, $p = .000$). Bressers's positive, neutral, and negative process interactions are ordinal in theory. Therefore, a Spearman rank-order correlation

coefficient was also run and revealed similar results ($r_s = -.895, p = .000$). The null hypothesis was rejected. There was sufficient evidence to support the claim that campus CCTs were more likely to experience forced cooperation in terms of likelihood of application.

Table 13

CIT Likelihood of Application Process Interaction by Institutional Characteristic

Characteristic		Motivation Score	Observed Interaction Possibilities
		<i>Mdn</i>	
Sector	Public	-1.00 (negative)	Ob/Op/FC/JL/N ^a
	Private	-.33 (negative)	Ob/Op/FC/JL/N
Setting	Rural	+.33 (positive)	AC/JL/FC/Op/Ob/N ^b
	Town	-.33 (negative)	Ob/Op/FC/JL/N
	Suburban	-1.00 (negative)	Ob/Op/FC/JL/N
	City	-.33 (negative)	Ob/Op/FC/JL/N
Student Housing ^c	Yes	-.33 (negative)	Ob/Op/FC/JL/N
	No	-1.00 (negative)	Ob/Op/FC/JL/N
Size	Small	-.33 (negative)	Ob/Op/FC/JL/N
	Mid-size	-1.00 (negative)	Ob/Op/FC/JL/N
	Large	-.33 (negative)	Ob/Op/FC/JL/N

Note. $n = 59$. This table separates the interaction by characteristic, although hypothesis testing was run in a bivariate correlation analysis cumulatively. CIT = contextual interaction theory.

^a Obstruction, Opposition, Forced Cooperation, Joint Learning, or None. ^b Active Cooperation, Joint Learning, Forced Cooperation, Opposition, Obstruction, or None. ^c On-campus.

A linear regression found the model significantly predicted the situational outcome, $R^2 = .844, F(1, 57) = 309.30, p = .000, 95\% \text{ CI } [-1.639, -1.304]$. Given that negative motivation from the surveyed group could lead to forced cooperation within

their team interactions, dummy coding dropped positive motivation from the moderator regression analyses (1 = negative and 0 = positive). Results revealed that neither setting, $R^2 = .845$, $F(3, 55) = 100.00$, $p > .05$; nor sector, $R^2 = .849$, $F(3, 55) = 102.80$, $p > .05$; and size, $R^2 = .854$, $F(3, 51) = 99.29$, $p > .05$, significantly affected how CCTOs' motivation predicted CCTs' likelihood of application process interactions. They also found that the existence of on-campus student housing, $R^2 = .845$, $F(3, 55) = 100.28$, $p > .05$, was not a statistically significant moderator (see Table 14).

Table 14

Moderator Analyses: Motivation Scores and Likelihood of Application Situations

Effect	ΔR^2	B	SE	<i>T</i>	<i>p</i>	95% CI
Campus Setting ^a	.001	-.032	.065	-.492	.625	[-.162, .098]
Institutional Sector ^b	.001	-.048	.070	-.696	.489	[-.188, .091]
Campus Size ^c	.000	-.013	.064	-.210	.834	[-.142, .115]
Student Housing ^d	.000	.020	.092	.029	.829	[-.165, .205]

Note. $n = 58$ for setting, sector, and housing; $n = 54$ for size. Linear regression. The dependent variable was the likelihood of application process interaction (1 = negative; 0 = positive). ΔR^2 = Change in R-Squared; B = unstandardized beta; SE = standard error; CI = confidence interval.

^a 0 = rural, town, and suburban; 1 = city. ^b 0 = private; 1 = public. ^c 0 = small and large; 1 = mid-size. ^d 0 = no; 1 = yes (on-campus only).

Owens (2008) remarked that it is reasonable to surmise that a measure of networking and governance already exists when testing for a policy instrument's likelihood of application. In order to understand Clery Act policy implementation, this

study recognized that likelihood of application involved the ability of implementers and target groups to establish or convene themselves to address compliance elements cross-departmentally and collaboratively. Once a CCT exists, it is assumed that a certain degree of production has occurred. The prerequisite for examining the degree of adequate application is that the instrument was applied and is in effect (Owens, 2008), thereby requiring data be withheld for any institution that resulted in a likelihood of joint learning or no interaction. However, earlier results produced a range of possibilities rather than a specific outcome. Therefore, every respondent underwent the second part of Phase 1 testing.

The second produced motivation value was funneled through the degree of adequate application (Chapter 2, Figure 3) flowchart to answer RQ2.

RQ2: How do actor motivation, information, and power impact CCTs' degree of adequate application at IHEs?

H_a2: Campus CCTs' degree of adequate application is more likely to experience negotiation or conflict if there are imbalances in motivation and information with relatively equal power between actors.

H₀2: There is no statistically significant difference between the degree of adequate application situations campuses' CCTs encounter based on actor characteristics.

Table 15*Degree of Adequate Application Scores by Mean*

Aspect	CIT Independent Variables		
	Motivation	Information	Power
Degree of Adequate Application	-.04 (423/698)	+.44 (156/264)	+.033 (138/234)

Note. $n = 59$. The power value is not a score difference. CIT = contextual interaction theory.

Of the respondents, 59 answered 24 questions to calculate their degree of adequate application motivation scores. CCOs, despite their institutions' characteristics, reported experiencing neutral motivation (-0.20 to $+0.20$; see Table 15). The observed interaction outcomes were active (constructive) cooperation, symbolic interaction/learning/leading, symbolic interaction, and active (obstructive) cooperation (see Table 16). Therefore, the situation was not found to be as predicted. The results remained using the median. The value ($Mdn = .20$, $IQR = 1.20$) indicated a neutral interaction ($Mdn = 0.0$, $IQR = 1.00$). Dummy coding held neutral motivation as the constant (1 = neutral and 0 = else), and the results of a Spearman correlation revealed no linear relationship and no statistical significance ($r_s = -.069$, $p = .602$). The null hypothesis was not rejected. There was insufficient evidence to reject the claim that campus CCTs are more likely to experience negotiation or conflict.

Table 16*CIT Degree of Adequate Application Process Interaction by Institutional Characteristic*

Characteristic		Motivation Score <i>Mdn</i>	Observed Interaction Possibilities
Sector	Public	+.14 (neutral)	ACC, SI/L/L, SI, AOC ^a
	Private	+.33 (positive)	ACC, JL, FCC, N/C, N, SI/L/L ^b
Setting	Rural	+.07 (neutral)	ACC, SI/L/L, SI, AOC
	Town	+.07 (neutral)	ACC, SI/L/L, SI, AOC
	Suburban	+.20 (neutral)	ACC, SI/L/L, SI, AOC
	City	+.20 (neutral)	ACC, SI/L/L, SI, AOC
Student Housing ^c	Yes	+.27 (positive)	ACC, JL, FCC, N/C, N, SI/L/L
	No	-.07 (neutral)	ACC, SI/L/L, SI, AOC
Size	Small	-.20 (neutral)	ACC, SI/L/L, SI, AOC
	Mid-size	+.20 (neutral)	ACC, SI/L/L, SI, AOC
	Large	+.33 (positive)	ACC, JL, FCC, N/C, N, SI/L/L

Note. $n = 59$. CIT = contextual interaction theory. This table separates the interaction by characteristic, although hypothesis testing was run in a bivariate correlation analysis cumulatively. Raw respondent scores included positive, neutral, and negative values.

^a Active (Constructive) Cooperation, Symbolic Interaction/Learning/Leading, Symbolic Interaction, Active (Obstructive) Cooperation. ^b Active (Constructive) Cooperation, Joint Learning, Forced Constructive Cooperation, Negotiation/Conflict, Negotiation, Symbolic Interaction/Learning/Leading. ^c On-campus.

A linear regression found the model did not significantly predict the situational outcome, $R^2 = .011$, $F(1, 57) = .610$, $p = .438$, 95% CI [-.111, .254]. The following were not found to significantly affect how CCOs' motivation predicted CCTs' degree of adequate application interaction: setting, $R^2 = .018$, $F(3, 55) = 0.33$, $p > .05$; sector, $R^2 = .029$, $F(3, 55) = 0.55$, $p > .05$; and, size $R^2 = .016$, $F(3, 51) = 0.27$, $p > .05$. However, the

on-campus student housing moderating variable was a statistically significant moderator, $R^2 = .228$, $F(3,55) = 5.40$, $p < .05$ (see Table 17).

Table 17

Moderator Analyses: Motivation Scores and Degree of Adequate Application Situations

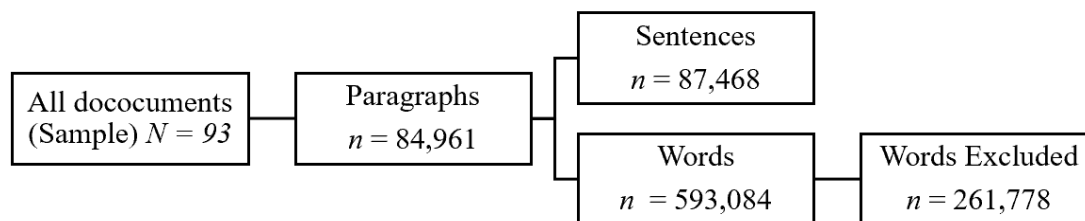
Effect	ΔR^2	B	SE	t	p	95% CI
Campus Setting ^a	.000	-.016	.190	-.083	.934	[-.396, .365]
Institutional Sector ^b	.001	.049	.189	.258	.797	[-.331, .428]
Campus Size ^c	.005	.096	.197	.488	.628	[-.300, .492]
Student Housing ^d	.099	-.653	.246	-2.657	.010	[-1.146, -.161]

Note. $n = 58$ for setting, sector, and housing; $n = 54$ for size. Linear regression. The dependent variable was the degree of adequate application situation (1 = neutral, 0 = else). ΔR^2 = Change in R-Squared; B = unstandardized beta; SE = standard error; CI = confidence interval.

^a 0 = rural, town and suburban, 1 = city. ^b 0 = private, 1 = public. ^c 0 = small and large, 1 = mid-size. ^d 0 = no, yes = 1 (on-campus only).

Phase 2

Within the representative sample ($n = 93$), the analysis covered (97.8%) hundreds of thousands of words (Figure 4).

Figure 4*Content Analysis Collection Frequencies*

Note. This model shows the computational basis for textual extraction.

Demographic Data

These data (see Table 18) revealed that program reviews generally occurred in 2011 and 2012 ($M = 9.96$, $SD = 5.233$). This outcome is notable. These years were during and after the act reauthorization that added the emergency notification requirement but before the added requirement to disclose statistics for, and procedures to, address dating violence, domestic violence, and stalking. These data also found (see Figure 5) that public institutions ($n = 42$) were reviewed more than private institutions ($n = 34$) but that both types of institutions' reviews averaged nearly four findings ($M = 4.00$, $SD = 3.193$ and $M = 3.71$, $SD = 2.195$, respectively). Size did not influence the degree of noncompliance among IHEs (see Figure 6). Although smaller ($n = 35$, $M = 4.17$, $SD = 2.802$) institutions were reviewed more than mid-size ($n = 17$, $M = 4.06$, $SD = 2.947$) and large ($n = 19$, $M = 3.53$, $SD = 2.894$) institutions, each size type averaged approximately four findings.

Words and phrases referring to information ($M = 11.54$, $SD = 18.796$) were present more than those referring to motivation ($M = 3.31$, $SD = 7.253$) and power ($M =$

.57, $SD = 1.664$). The data set focused on findings ($M = 35.92$, $SD = 57.226$), prominently characterizing the dependent variable with phrases (see Table 19) such as “failure” or “failures” ($n = 1,383$, 93.55%), “these violations” ($n = 689$, 50.54%), “violation” or “violations identified” ($n = 200$, 48.39%), and “serious violation” or “violations” ($n = 176$, 49.46%).

Table 18

Descriptive Statistics for Content Analysis

	<i>M</i>	<i>SD</i>	Min	Max
Review Descriptor				
Review Age	9.96	5.233	2	24
Clery-Focused Findings	3.53	2.644	1	13
Independent Variable				
Information Words and Phrases	11.54	18.796	0	134
Motivation Words and Phrases	3.31	7.253	0	44
Power Words and Phrases	.57	1.664	0	9
Dependent Variable				
Findings Words and Phrases	35.92	57.226	0	273

Note. The review age is from 2021, which is the year of data collection. Information = requisite knowledge and information sharing. Motivation = personal and positional factors that encourage or discourage participation. Power = capacity and control.

Figure 5

Stacked Bar of Number of Review Findings by Institutional Sector

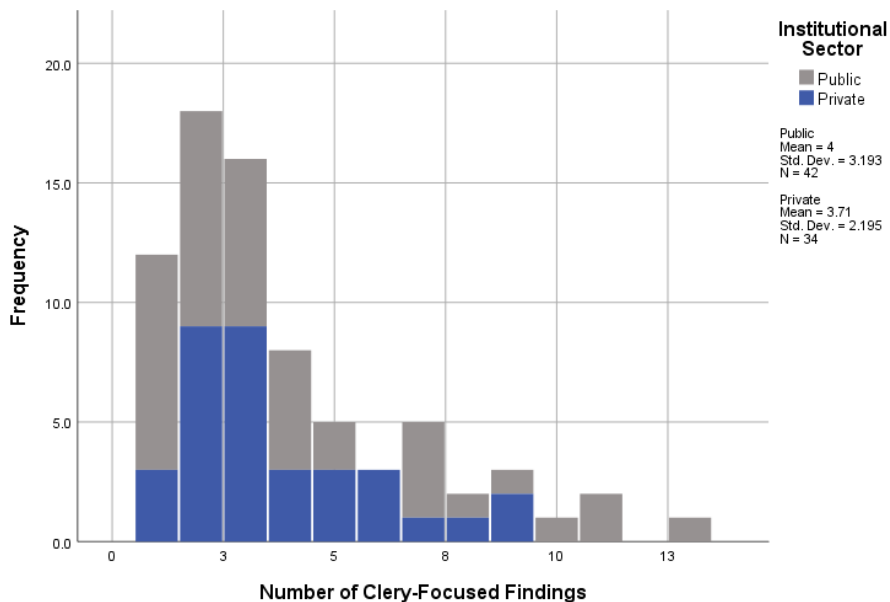


Figure 6

Stacked Bar of Number of Review Findings by Institutional Size

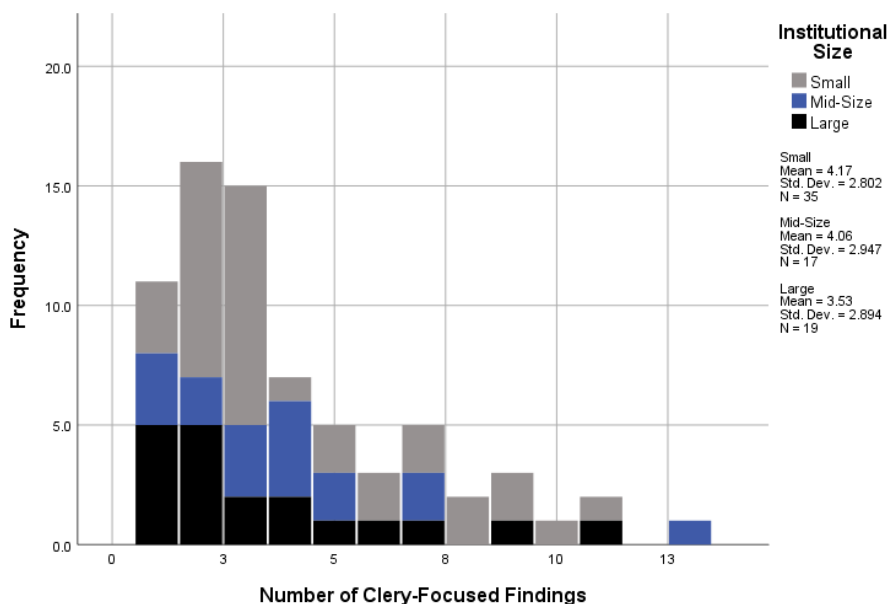


Table 19*Content Analysis Code Frequencies*

Keyword or Phrase ^a	Freq	%	Cases	% Cases	TF • IDF
Failure*	1383	0.43	87	93.55	40.1
These_Violation*	689	0.21	47	50.54	204.2
Documentation	564	0.18	68	73.12	76.7
Violation*_Identified	200	0.06	45	48.39	63.1
Serious_Violation*	176	0.05	46	49.46	53.8
Discrepancies	148	0.05	37	39.78	59.2
Identified_Violation*	135	0.04	33	35.48	60.7
Internal_Control*	121	0.04	28	30.11	63.1
Require_Additional_Corrective_Action*	118	0.04	35	37.63	50.1
Accuracy	96	0.03	41	44.09	34.1
Goal*	93	0.03	30	32.26	45.7
Inaccurate	81	0.03	45	48.39	25.5
Training_Programs	81	0.03	34	36.56	35.4
Multiple_Violation*	77	0.02	32	34.41	35.7
Corrective_Action_Plan*	76	0.02	21	22.58	49.1
Coordination	66	0.02	20	21.51	44.1
Willing*	56	0.02	15	16.13	44.4
Participate	49	0.02	22	23.66	30.7
Violation*_Noted	41	0.01	23	24.73	24.9
Impose_Disciplinary_Sanction*	33	0.01	27	29.03	17.7
Serious_Consequence*	31	0.01	23	24.73	18.8
Deficient	30	0.01	15	16.13	23.8
Understanding	29	0.01	16	17.20	22.2
Violation*_Documented	27	0.01	16	17.20	20.6

Note. This table includes the number of occurrences of a keyword or phrase within the entire dataset (FREQ), the percentage based on the total number of words included in the analysis (%), the number of cases where the keyword or phrase appears (CASES), the percentage of cases where the keyword or phrase appears (%CASES), and the keyword

or phrase frequency weighted by the inverse document frequency (TF • IDF). Case occurrences less than 25 were excluded.

^a Adding an asterisk (*) to a keyword or phrase permitted data analyses to include plural forms and suffixes.

Content Analysis Statistical and Hypothesis Testing

This study found (see Table 20) the differences between group means for keywords and phrases involving motivation, $t(74) = 1.047$, $p = .298$, $d = .208$; information, $t(74) = .823$, $p = .413$, $d = .148$; power, $t(74) = .869$, $p = .374$, $d = .210$; and finding, $t(74) = .392$, $p = .696$, $d = .089$, for public and private institutions were not statistically significant. However, all variable effect sizes met the revised minimum standard for a very small ($d \geq .01$) or small ($d \geq .2$) effect (Sawilowsky, 2009).

Table 20

Code Category Analysis Examining Institutional Sector

Variable	Public		Private		$t(74)$	p	Cohen's d
	M	SD	M	SD			
Finding	40.45	63.177	35.35	46.748	.392	.696	.089
Information	12.83	15.413	10.06	13.542	.823	.413	.148
Motivation	3.95	7.322	2.44	4.594	1.047	.298	.208
Power	.76	1.948	.41	1.459	.869	.374	.210

Note. $n = 76$. Independent Samples t -Test.

No statistically significant differences were found between group means for the finding, $F(2, 68) = .467$, $p = .629$; information, $F(2, 68) = .508$, $p = .604$; motivation, $F(2, 68) = .041$, $p = .960$; and power, $F(2, 68) = .401$, $p = .671$, code categories (see

Table 21) concerning institutional sector. Effect sizes, according to Cohen's (1988) rule, also showed no practical significance among these outcomes.

Table 21

Means, Standard Deviations, and One-Way ANOVA

Measure	Small		Mid-Size		Large		<i>F</i> (2, 68)	η^2
	<i>M</i>	<i>SD</i>	<i>M</i>	<i>SD</i>	<i>M</i>	<i>SD</i>		
Finding	46.80	62.072	35.65	52.457	32.05	54.557	.467	.014
Information	13.63	15.405	9.24	12.377	11.32	16.647	.508	.015
Motivation	3.29	5.675	3.29	6.574	3.79	7.878	.041	.001
Power	.66	1.731	.35	1.455	.89	2.208	.401	.012

Note. $n = 71$. ANOVA = analysis of variance. The analysis ran by institutional size via the program reviews and did not include distance-learning enrollment.

Discovering any relationships within or between program review determinations required answering the third research question:

RQ3: Which characteristic (motivation, information, and power) exerts the most significant influence on institutional compliance?

H_{a3}: Of the three characteristics, power will exert the most significant influence on institutional compliance.

H₀₃: There is no statistically significant difference between the influence exerted on institutional compliance by motivation, information, and power.

A Pearson correlation was run to determine the relationship between the CIT and program reviews. There were strong, positive and statistically significant relationships between each independent variable's keywords and phrases and language used to

describe compliance findings: motivation, $r(91) = .851, p < .001$; information, $r(91) = .884, p < .001$; and power, $r(91) = .686, p < .01$ (see Table 22).

Table 22

Descriptive Statistics and Correlations for Content Analysis Variables

Variable	<i>n</i>	<i>M</i>	<i>SD</i>	1	2	3	4
Findings	93	35.92	57.226	–			
Information	93	11.54	18.796	.884*	–		
Motivation	93	3.31	7.253	.851*	.923*	–	
Power	93	.57	1.664	.686*	.723*	.780*	–

Note. $n = 93$. Pearson product-moment correlation.

* $p < .01$.

A multiple regression analysis was run (see Table 23) to predict findings from motivation, information, and power. The three-predictor model revealed a statistically significant effect on the dependent variable, $R^2 = .791, F(3, 89) = 112.15, p = .000$. There was sufficient evidence to reject the null hypothesis and support the claim that one variable exerts the most significant influence on institutional compliance. However, the alternative hypothesis' specific prediction that the most influential variable would be power was not found. The strength and direction of the relationship and the significance of its predictability identified information as being the most significant influence on institutions' inability to comply with the Clery Act.

Table 23*Multiple Regression of Association Between Code Categories*

Variable	B	SE	β	95% CI		<i>t</i>
				<i>LL</i>	<i>UL</i>	
Information	2.022	.383	.664	1.261	2.784	5.274*
Motivation	1.566	1.098	.198	-.615	3.747	1.426
Power	1.741	2.666	.051	-3.555	7.038	.653

Note. $n = 93$. The dependent variable was the finding codes category. B = unstandardized beta; SE = standard error; β = standardized beta; CI = confidence interval; LL = lower limit; UL = upper limit; t = statistical significance. R^2 (R-squared) = .791.

* $p < .01$.

The multiple regression results were not sustained when moderators (sector and size) were added to the analyses. Only the power/size interaction resulted in a change ($\Delta R^2 = 1.2\%$), but neither it nor any other interactions were statistically significant ($p > .05$; see Table 24).

Table 24*Regressions of Associations Between Code Categories and Institution Characteristics*

	ΔR^2	B	SE	<i>t</i>	<i>p</i>	95% CI
Sector^a						
Information	.002	.360	.398	.906	.368	[-.433, 1.153]
Motivation	.000	.059	1.380	.042	.966	[-2.693, 2.810]
Power	.001	1.843	6.265	.294	.770	[-10.647, 14.332]
Size^b						
Information	.000	.058	.387	.149	.882	[-.714, .830]
Motivation	.005	1.307	1.177	1.111	.271	[-1.042, 3.656]
Power	.012	6.997	5.864	1.193	.237	[-4.707, 18.701]

Note. $n = 76$, institutional sector; $n = 71$, institutional size. The dependent variable was the finding codes category. ΔR^2 = Change in R-Squared; B = unstandardized beta; SE = standard error; CI = confidence interval.

^a 0 = private, 1 = public. ^b 0 = mid-size and large, 1 = small.

Summary

Data collection for this study ran into challenges involving respondent participation. Nevertheless, data were collected from Association A, and Phase 2 proceeded as planned. Statistical testing examined motivation amid team dynamics and organizational context against the likelihood of application and the degree of adequate application for CCTs. The study also questioned which contextual factor impacted Clery Act compliance most according to the ED's perspective. Findings showed significant relationships between actor motivation and the likelihood that institutions could assemble CCTs to address compliance via forced cooperation. Results also found that CCTs were experiencing interactions other than negotiation and conflict throughout their policy implementation processes. Additional testing found statistically significant relationships between the CIT and federal Clery Act program review determinations, but only information significantly predicted Clery Act noncompliance. However, computational analyses found nearly no statistically significant effect on these results when including moderating factors. The interpretation and implications of these findings as they relate to the literature and the CIT framework are discussed in Chapter 5.

Chapter 5: Discussion, Conclusions, and Recommendations

Introduction

This study was pursued because research involving the Clery Act has been overwhelmingly one-dimensional. Beverage (2019) classified the existing literature into four themes: policy perception, policy legislation, policy compliance, and policy implementation. Each theme is distinguishable yet connected by mutual influence. Her salient remarks concluded that studies addressing Clery Act policy implementation were scarce and that existing research did not focus on underlying context. The inspiration for this study was the absence of rigorous empirical examinations regarding IHE actors and their influencing factors. This research was used to expand field knowledge of the effects of group and contextual dynamics on Clery Act implementation in higher education. Practitioners were surveyed through a questionnaire that measured their motivation levels to predict possible situational interactions as forecasted by the CIT. A within-methods methodological triangulation strategy was employed using quantitative content analysis.

The results presented in Chapter 4 showed statistically significant relationships between actor motivation and forced cooperation. Significant relationships were also found between group dynamics (motivation, information, and power) and noncompliance within FPRDs. However, results revealed that participants did not experience negotiation or conflict while participating in their campus CCT. Furthermore, strengths among relationships were no longer statistically significant when considering institutional sector, size, or setting. They tended to be statistically significant, however, when considering whether there was on-campus student housing.

Chapter 5 interprets these findings in the context of the CIT and previous research. This concluding chapter includes limitations affecting the study's generalizability and recommendations for future research. It also describes the study's implications for social change.

Interpretation of the Findings

The CIT involves interfaces within policy implementation by simplifying copious contextual factors into three impacting variables: motivation, information, and power (Bressers, 2004, 2007, 2009). The framework involves calculating positive, negative, and neutral scale values of these impacting variables. Examinations within this study demonstrated that in the view of the ED FSA, unstructured or lacking goals (motivation), poor or absent documentation (information), and deficient custody and control (power) explained variances in findings. These results are consistent with McNeal's (2007) previously mentioned assertions and consider mutual influence between motivation, information, and power factors.

Power differentials were not a significant predictor of noncompliance. Instead, insufficient information caused institutions to fail to meet statutory and regulatory obligations of the Clery Act. These findings reflect those of McNeal (2007) and DeBowes (2014) and, in the same manner, suggest that a greater understanding of procedural aspects and Clery Act-related training for target groups are paramount to meeting the ED's expectations. These findings also reflect the purpose of a program review: to identify liabilities, evaluate the extent of compliance, and conduct periodic assessments of institutions' external accountability to the public. While motivation and

power are important, information is the only variable that addresses both contextual and tangible factors. Information goes beyond knowledge and specifically includes documentation (Owens, 2016). Program review guidance prepared by the ED has said that formal notifications sent to institutions scheduled to undergo reviews include a list of information they are required to submit before entrance counseling (FSA, 2017). This information is at the center of the ED's investigation and serves as a barometer for knowledge, transparency, and documentation.

Examining team member interactions is the cornerstone of CIT research but with a different focus than the present study. In previous studies, the Figure 2 and 3 flowcharts in Chapter 2 have been used as an initial test and were followed by the use of the theory's formulaic expression, which is $[(M+) \times (I+) \times [1 - (M-) \times (P-)]]$ (Bressers, 2005, as cited in Owens & Bressers, 2013). Owens and Bressers's (2013) case-study examination explained that the CIT formula tests whether there is a meaningful linear relationship between the theory's independent variables and observed process interactions. The combined analysis predicts the achieved outcome and then compares the flowchart result (expected) to the values of the formulaic expression (observed) to understand the CIT's predictability potential. This additional background is vital for understanding this study's application of the CIT, which resulted in expanded testing of the framework.

This study acknowledges Bressers's inferred conclusions that motivation is the interaction catalyst for the figures' expression. In other words, the information score used to narrow a CIT-situation prediction is that of the more motivated actor, which is then compounded by the calculated power differential score to determine a specific process

interaction (Bressers, 2004; Owen, 2008). However, this study examined the CIT's flowcharts predicted process outcomes using bivariate correlation and regression testing. It did not, like preceding literature, examine a relationship between flowchart-determined outcomes and formulaic expression-determined outcomes to surmise the accuracy of the flowcharts' predictions.

This study's findings related to the first hypothesis were statistically significant. Participants' motivation scores connected meaningfully to their process interactions, and the sample's likelihood of applying a CCT was strong and inverse. This result reflects Owen's (2008) process interaction scale. The more positive the motivation scores, the more favorable the situational outcomes, given that the dependent variable has the highest scale for the most unfavorable outcome. Unexpectedly, there was no relationship between the sample's motivation and degree of adequate application. The reason for this somewhat contradictory result is still not entirely apparent.

This study's methodological approach differed from previous research, but its findings were analogous. The results also indicated that most institutions had a CCO who was not in a full-time dedicated position, and most of the CCO positions were in public institutions. However, relationships between CCO commitment, institutional sector, and campus setting were not statistically significant. These results are similar to Gregory et al. (2016). They found no statistically significant relationships between institutions having CCOs and their campus sectors and settings with valid frequencies of 444 and 355, respectively. They also found that nearly 75% of their respondents reported having a CCO. Of those institutions, approximately 91% reported the position was a collateral

duty. The ED's definition of administrative capability requires institutions to have a dedicated position designated to Clery Act compliance management. Nevertheless, this study suggests that public institutions are meeting that requirement more often than private institutions. Furthermore, juxtaposed results suggest uncertainty as to whether campuses have CCOs with the necessary requisite training, commitment, and interdepartmental authority to effect strategic plans, complete critical tasks, and achieve compliance with federal government expectations.

The triangulation's complementarity reinforced that motivation is the CIT interaction catalyst. The content analysis results found that information is the dominant cause for IHE's Clery Act noncompliance; therefore, a reasonable conjecture could connect both data sets to further predictions using the CIT's flowcharts (Chapter 2, Figures 2 and 3). Using such complementary methods is supported by the insufficient information results produced for the likelihood of application (+.38; Table 12) and degree of adequate application (+.44; Table 15) stages in Phase 1. Presuming the surveyed association is the most motivated actor, deficient information found in both phases merged with Phase 1 negative motivation results could narrow the expected likelihood of application process interaction to none. It could also narrow predictions of an adequate degree of application to symbolic interaction. This would mean that CCTs are not meeting and that when they are, their work together is emblematic rather than productive. However, this conclusion should be interpreted with caution, given this study's inability to determine motivation levels between actor groups.

Notwithstanding the limitations affecting the study's methodology and consequently the results, these inferences describe situations where the interactions between implementers and target groups at the campus level are not evolving beyond mere task completion and periodic communication. Similarly, Gregory et al. (2016) found that an overwhelming number of Clery Act compliance duties were the sole responsibility of CCOs. They also found that most CCOs who participated in their study had a CCT and spent less than 11 hours a week addressing compliance.

Limitations of the Study

Researcher bias was a limitation. As a CCO, I benefitted from fluency in Clery Act terminology and had preconceptions about the challenges CCOs face. It should be noted that my being a member of Association A did not influence the interpretation of this study's findings. Necessary steps to counteract these limitations included saturating existing literature and following Bressers's (2007) prescribed theoretical assumptions. Equally important was the potential impact of the COVID-19 pandemic and the disadvantages of using survey and content analysis methods with the CIT framework. Potential participants may have suffered survey fatigue. The associated feelings of overwhelmingness or disinterestedness may have caused them not to consent or withdraw from completing the questionnaire. These feelings may have been especially triggered by the international climate resulting from the health crisis.

A disadvantage of the chosen methodology is that Phase 1 only included research-supported IHE positions responsible for Clery Act compliance. Moreover, included responses were self-reported and directly informed by participants' interpretation of the

questionnaire. Advantages, such as standardization and scalability with the CIT's measurement technique, practicality for this study's initial goals, and respondent anonymity, counterbalanced these weaknesses. Additionally, the study did not meet the sample size required for Phase 1 generalizability and for fully testing the CIT. Nevertheless, including triangulation methods provided an in-depth picture and created different ways to investigate the research problem.

The quantitative content analysis executed explanatory rather than exploratory measures and may have isolated words and phrases from their surrounding context. Access and time also determined the study's methodology. Data collection drew from publicly published program reviews because they were more accessible than records from the ED. Submitting public records requests would have jeopardized the study's timeframe. These limitations suggest several future research possibilities.

Recommendations

This study filled a gap in the field of Clery Act compliance research, and continued research in this direction would benefit the act's compliance practitioners. Future researchers may want to consider conducting a multiple-case study. Narrowing the target population (a university system, a group of surrounding colleges, campuses that launched a CCT within the past year) would permit exploring why and how implementation strategies and protocols are in place rather than what strategies and protocols exist and who is responsible for them. Future researchers would understand group dynamics and actor interaction both compartmentally and collectively amid a specifically identified implementation output or outcome. They could describe specific,

structural, and wider contexts that have affected actors' motivation, information, and power, leading to and underlying the explored output or outcome.

It is also recommended that future research include exploring or examining institutions' responses to PRRs. Researchers could gain empirical knowledge about institutions' compliance expectations, actor roles, and first-person perspective about shortcomings and legislative interpretation in relation to their implementation failures. Researchers could also consider correlating keywords and phrases that describe motivation, information, and power to specific instances of Clery Act noncompliance (e.g., failure to demonstrate a lack of administrative capability or failure to maintain an accurate daily crime log). Both qualitative and quantitative scientific inquiries could delve into the perceptions of implementing organizations instead of perspectives from the enforcement agency. Using the CIT and its variables is intrinsic to every recommendation.

Implications

The single most striking observation to emerge from the data was significant associations and causality across all institutional types in terms of actors' experiences with negative motivation regarding establishing or convening CCTs. These results can support campuses in conducting risk assessments under a subjective standard that provides process- and response-improvement opportunities. The use of CIT is important because prescribed monikers (positive, negative, and neutral) and scales (-1.00 to +1.00 and 0.0 to +1.0) are easily understood and appropriate standards for an audience to recognize (Owens, 2008).

It is my opinion that this study is seminal in its own right because the research advances the CIT's theoretical application outside of environmental and public health policy and addresses Clery Act compliance administratively. Tackling statutory and regulatory obligations for institutions is no different from that of other policy implementation. Assembling and identifying the members of a CCT are early stages in campuses compliance processes that are necessitated by the ED's expectations for establishing administrative capability. The remaining process stages presuppose that implementing organizations will create supporting policies and procedures that standardize CCT expectations and goals to strengthen policy efforts. This study provided a foundation for professional associations with considerable reach to evaluate issues beyond anecdotal understanding and, by extension, to advocate for additional support from the federal government during periods of negotiated rule-making that will directly impact IHE implementation experiences.

Professional associations offer training on common compliance findings and strongly emphasize supporting documentation is a crucial part of Clery Act compliance. The results of this study serve as an impetus for social change with regard to the development of strategic initiatives able to address deficiencies and prescribe best practices for identifying and reconciling influential outside factors. Institutions can draw inspiration from this study's questionnaire to identify gaps in hierarchical and lateral support, internal controls, communication, and action-oriented goals. Triangulating data revealed contentious and imbalanced situations. Social change is further predicated on institutions using these results to assess their organizational and structural environments

and team members' current roles to define effective ways to keep involved persons engaged. Campuses can also use these results to encourage CCT training and strengthen information-sharing procedures to meet time-based requirements.

It would be remiss not to discuss recent changes and their potential impact on this study's findings. The ED rescinded *The Handbook for Campus Safety and Security Reporting* on October 9, 2020, and replaced it with a *Federal Student Aid Handbook* appendix in an electronic announcement (OPE, 2021). The U.S. Secretary of Education attributed the decision to an internal review provisionally granted by Executive Order 13891. The review found subregulatory guidance was convoluted and placed an unintentionally expanded emphasis on Clery Act compliance practitioners. Remediation included eliminating intended burdens and regrouping institutions' focus on statutory and regulatory requirements. Notably, the results and discussion detailed above remain salient and are in no way diminished. Shortly after the release of the rescission, the federal Clery Act Compliance Division director reassured institutions that the ED's expectations are rooted in regulation, that reviews are conducted based on those statutory elements, and that the Handbook would be an appropriate resource until 2021 for IHEs' 2020 crime data (personal communication, October 26, 2020). This study's implications maintain their significance. The recent rescission bears no effect on their importance or impact.

Conclusion

This study succeeded in advancing Clery Act and CIT research. The results show that positions directly responsible for the act's compliance suffer from internal and external factors demotivating participation in their campuses' CCTs. Implementation

actors' attitudes toward their stakeholders, self-effectiveness, team objectives, incompatibility with implementation goals, and normative, cultural, and political contexts governing their institutions reflect unpropitious experiences. Meeting the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act requires more than completing enumerated tasks. It requires public administration management via collaborative networks and documented efforts grounded in institutional policies and procedures assessed for effectiveness against the legislation. The CIT framework should serve as the basis for future research because it grants practitioners a deeper empirical understanding of the intrinsic managerialism of Clery Act compliance.

References

- Adjustment of Civil Monetary Penalties for Inflation, 86 F.R. § 7974 (2021).
<https://www.govinfo.gov/content/pkg/FR-2021-02-03/pdf/2021-02231.pdf>
- Beamer, S. A. (2011). Private vs. public higher education budgeting: Key differences exist between private and public institutions that affect budgeting in critical ways. *Planning for Higher Education*, 40(1), 7-11.
- Beavers, J. M., & Halabi, S. F. (2017). Stigma and the structure of Title IX compliance. *The Journal of Law, Medicine & Ethics*, 45(4), 558-568.
<https://doi.org/10.1177/1073110517750596>
- Bess, J.L., & Dee, J.R. (2012). *Understanding college and university organization: Theories of effective policy and practice, volume I – the state of the system*.
<https://styluspub.presswarehouse.com/browse/book/9781579227685/Understanding-College-and-University-Organization>
- Beverage, S.G. (2019). *A case study: Clery Act policy and implementation strategies* (Publication No. 13901788) [Doctoral dissertation, Concordia University–Portland]. ProQuest Dissertations and Theses Global.
- Birnbaum, R. (1989). The cybernetic institution: Toward an integration of governance theories. *Higher Education*, 18(2), 239-253.
- Blimling, G. S. (2003). *The Resident assistant: Applications and strategies for working with college students in residence halls*.
<https://books.google.com/books?id=tkBatGHbGe4C>

- Blimling, G. S. (2014). *Student learning in college residence halls: What works, what doesn't, and why*. <https://books.google.com/books?id=CtOSBQAAQBAJ>
- Bressers, H. (2007). Contextual interaction theory and the issue of boundary definition: Governance and the motivation, cognitions and resources of actors. University of Twente.
https://www.researchgate.net/publication/252252061_Contextual_Interaction_Theory_and_the_issue_of_boundary_definition_Governance_and_the_motivation_cognitions_and_resources_of_actors
- Bressers, H. (2009). From public administration to policy networks: Contextual interaction analysis. In S. Nahrath and F. Varone (eds.), *Rediscovering public law and public administration in comparative policy analysis: Tribute to Peter Knoepfel* (pp. 123-142). <https://books.google.com/books?id=sk1QEG9FX8C>
- Bressers, H., & de Boer, C. (2013). Contextual interaction theory for assessing water governance, policy, and knowledge transfer. In C. de Boer, J. Vinke-de Kruif, G. Özerol, & H. Bressers (Eds.), *Water governance, policy and knowledge transfer: International studies on contextual water management* (pp. 36-54).
https://books.google.com/books?id=4pmBhg0Q_yEC
- Bressers, H.T.A. (2004). Implementing sustainable development: How to know what works, where, when and how. In W.M. Lafferty (Ed.), *Governance of sustainable development: The challenge of adapting form to function* (pp. 284-318). Edward Elgar Publishing, Inc.

- Bressers, J.T.A. (1983). *Beleidseffectiviteit en waterkwaliteitsbeleid (Policy effectiveness and water quality policy)* [Unpublished doctoral dissertation]. University of Twente.
- Brinkley, Jr., W.C., & Laster, J.D. (2003). Campus crime in Missouri: An analysis and comparisons of crime in four-year colleges and universities. *Journal of Security Administration*, 26(1), 1-15. <https://www.ncjrs.gov/Library.html>
- California State University, Monterey Bay. (2020). *Administration & Finance*. Retrieved January 20, 2020, from <https://csumb.edu/af>
- Campus Sexual Violence Elimination Act, H.R. 812, 113th Congress. (2013). <https://www.govtrack.us/congress/bills/113/hr812/summary>
- Chekwa, C., Thomas, E., & Jones, V.J. (2013). What are college students' perceptions about campus safety? *Contemporary Issues in Education Research*, 6(3), 325.
- Clery Center. (2015, April 23). *Effective team dynamics: The power of the process* [Video]. https://www.youtube.com/watch?v=3_vUE9kgdRU
- Cohen, J. (1988). *Statistical Power Analysis for the Behavioral Sciences* (2nd ed.). Routledge. <https://doi.org/10.4324/9780203771587>
- College and University Security Information Act, Pub. L. No. 448, No. 73 (1988). <https://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=1988&sessInd=0&act=73>
- College and University Security Information Act, Pub. L. No. 591, No. 87, § 3 Stat 2501-3 (1994). <https://www.legis.state.pa.us/WU01/LI/LI/US/PDF/1994/0/0087..PDF>

- Daniel, B. (2015). The value of big data in higher education: Corrected version. *British Journal of Educational Technology*, 46(5), 904-920.
<https://doi.org/10.1111/bjet.12230>
- DeBowes, M. M. (2014). *Student conduct administrator knowledge of the statistical reporting obligations of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* (Order No. 3580491) [Doctoral dissertation, Old Dominion University]. ProQuest Dissertations & Theses Global.
- Djellouli, N., & Quevedo-Gómez, M.C. (2015). Challenges to successful implementation of HIV and AIDS-related health policies in Cartagena, Colombia. *Social Science & Medicine*, 133, 36-44. <https://doi.org/10.1016/j.socscimed.2015.03.048>
- Fletcher, J.A., & Friedel, J.N. (2016). Typology of state-level community college governance structures. *Community College Journal of Research and Practice*, 41(4-5), 311-322. <https://doi.org/10.1080/10668926.2016.1251355>
- Frankfort-Nachmias, C., & Leon-Guerrero, A. (2015). *Social statistics for a diverse society* (7th ed.). SAGE Publications, Inc.
- Gardella, J.H., Nichols-Hadeed, C.A., Mastrocinque, J.M., Stone, J.T., Coates, C.A., Sly, C.J., & Cerulli, C. (2015). Beyond Clery Act statistics: A closer look at college victimization based on self-report data. *Journal of Interpersonal Violence*, 30(4), 640-658. <https://doi.org/10.1177/0886260514535257>
- Ghasemi, A., & Zahediasl, S. (2012). Normality tests for statistical analysis: a guide for non-statisticians. *International journal of endocrinology and metabolism*, 10(2), 486–489. <https://doi.org/10.5812/ijem.3505>

- Gregory, D. E. & Janosik, S. M. (2003). The effect of the *Clery Act* on campus judicial practices. *Journal of College Student Development*, 44(6), 763-778.
<https://doi.org/10.1353/csd.2003.0068>
- Gregory, D. E., & Janosik, S. M. (2002). The Clery Act: How effective is it? Perceptions from the field – the current state of the research and recommendations for improvement. *The Stetson Law Review*, 32, 7-59.
<https://www.stetson.edu/law/lawreview/>
- Gregory, D. E., & Janosik, S. M. (2006). The views of senior residence life and housing administrators on the Clery Act and campus safety. *Journal of College and University Student Housing*, 34(1), 50-57.
- Gregory, D.E., Giblin, J., Stafford, D.A., & DeBowes, M.M. (2016). Clery compliance on American campuses: Knowledge and organization by Clery compliance officers. *Security Journal*, 29(4), 710-729. <https://doi.org/10.1057/sj.2016.1>
- Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap in Vocational Education Programs, 34 C.F.R. § 100. <https://www.govinfo.gov/content/pkg/CFR-2011-title34-vol1/pdf/CFR-2011-title34-vol1-part106-appA.pdf>
- Han, W., Ada, S., Sharman, R., & Rao, H.R. (2015). Campus emergency notification systems: An examination of factors affecting compliance with alerts. *MIS Quarterly*, 39(4), 909-929. <https://doi.org/10.25300/misq/2015/39.4.8>
- Higher Education Act Amendments, Pub. L. No. 102-325 § 2, 106 Stat 2381 (1992).
<https://www.congress.gov/102/statute/STATUTE-106/STATUTE-106-Pg448.pdf>

Higher Education Act, 20 U.S.C. § 1092(f) (1998).

<https://www2.ed.gov/policy/highered/leg/hea98/sec486.html>

Higher Education Act, 20 U.S.C. § 1099c (1965).

<https://www.govinfo.gov/content/pkg/STATUTE-79/pdf/STATUTE-79-Pg1219.pdf#page=37>

Higher Education Opportunity Act, Pub. L. 110-315 (2008).

<https://www2.ed.gov/policy/highered/leg/hea08/index.html>

Hill, M., & Hupe, P. (2002). *Implementing public policy*. <https://uk.sagepub.com/en-gb/eur/implementing-public-policy/book240256>

Hophmayer-Tokich, S. (2013). Water pollution control legislation in Israel:

Understanding implementation processes from an actor-centered approach. *Water*, 5, 1393-1418. <https://doi.org/10.3390/w5031393>

Institutional security policies and crime statistics, 34 C.F.R. § 668.46 (2011).

<https://www.govinfo.gov/content/pkg/CFR-2011-title34-vol3/pdf/CFR-2011-title34-vol3-sec668-46.pdf>

Institutional security policies and crime statistics, 34 C.F.R. § 668.46 (2015).

<https://www.govinfo.gov/content/pkg/CFR-2015-title34-vol3/pdf/CFR-2015-title34-vol3-sec668-46.pdf> 1

Institutional security policies and crime statistics, 34 C.F.R. § 668.46 (2019).

<https://www.govinfo.gov/content/pkg/CFR-2019-title34-vol3/pdf/CFR-2019-title34-vol3-sec668-46.pdf>

Institutional security policies and crime statistics, 34 C.F.R. § 668.46 (2020).

<https://www.govinfo.gov/content/pkg/CFR-2020-title34-vol3/pdf/CFR-2020-title34-vol3-sec668-46.pdf>

Israel, G.D. (1992). Determining sample size. *Program Evaluation and Organizational Development* [Fact Sheet].

<https://www.tarleton.edu/academicassessment/documents/Samplesize.pdf>

Janosik, S.M. (2004). Parents' views on the Clery Act and campus safety. *Journal of College Student Development*, 45(1), 43-56.

<https://doi.org/10.1353/csd.2004.0010>

Janosik, S.M., & Gregory, D.E. (2003). The *Clery Act* and its influence on campus law enforcement practices. *NASPA Journal*, 41(1), 180-197.

<https://doi.org/10.2202/1949-6605.1311>

Janosik, S.M., & Gregory, D.E. (2009). The Clery Act, campus safety, and the perceptions of senior student affairs officers. *NASPA Journal*, 46(2), 208-227.

<https://doi.org/10.2202/1949-6605.6039>

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, 20

U.S.C. § 1092(f) (2019). <https://www.govinfo.gov/content/pkg/USCODE-2019-title20/pdf/USCODE-2019-title20-chap28-subchapIV-partG-sec1092.pdf>

Jones, S., Lefoe, G., Harvey, M., & Ryland, K. (2012). Distributed leadership: A collaborative framework for academics, executives and professionals in higher education. *Journal of Higher Education Policy and Management*, 34(1), 67-78.

<https://doi.org/10.1080/1360080X.2012.642334>

- Kezar, A.J., & Eckel, P.D. (2002). The effect of institutional culture on change strategies in higher education: Universal principles or culturally responsive concepts? *The Journal of Higher Education*, 73(4), 435-460.
<https://doi.org/10.1353/jhe.2002.0038>
- Kiss, A. (2018, May 16). 3 traits of a successful clery compliance coordinator. *Campus Safety Magazine*.
https://www.campussafetymagazine.com/clery/3_traits_of_a_successful_clery_compliance_coordinator/
- Koch, V. A. (2016). Current practices in resident assistant training. *Journal of College and University Student Housing*, 42(3), 80-97.
https://www.nxtbook.com/nxtbooks/acuho/journal_vol42no3/index.php#/82
- Kotzebue, J. R., Bressers, H. T. A., & Yousif, C. (2010). Spatial misfits in a multi-level renewable energy policy implementation process on the Small Island State of Malta. *Energy policy*, 38(10), 5967-5976.
<https://doi.org/10.1016/j.enpol.2010.05.052>
- Lee, C.W., & Zhong, J. (2014). Top-down strategy for renewable energy investment: Conceptual framework and implementation. *Renewable Energy*, 68, 761-773.
<https://doi.org/10.1016/j.renene.2014.03.015>
- Letarte, C.M. (2013). Keepers of the night: The dangerously important role of resident assistants on college and university campuses. *Kentucky Journal of Higher Education Policy and Practice*, 2(2), 1-24.

- Martin, W. E., & Bridgmon, K. D. (2012). *Quantitative and statistical research methods: From hypothesis to results*. <https://ebookcentral.proquest.com>
- Matland, R.E. (1995). Synthesizing the implementation literature: The ambiguity-conflict model of policy implementation. *Journal of Public Administration Research and Theory: J-PART*, 5(2), 145-174.
<https://doi.org/10.1093/oxfordjournals.jpart.a037242>
- McCallion, G. (2014, October 20). *History of the Clery Act: Fact sheet* (CRS Report No. R43759). <https://www.hsdl.org/?view&did=759350>
- McNeal, L. R. (2007). Clery Act: Road to compliance. *Journal of Personnel Evaluation in Education*, 19(3), 105-113. <https://doi.org/10.1007/s11092-007-9042-7>
- Messick, S. (1989). Validity. In R.L. Linn (Ed.), *Educational measurement* (3rd ed., pp. 13-103). Macmillan.
- Miller, T.E., & Sorochty, R.W. (2014). *Risk management in student affairs: Foundations for safety and success*. <https://books.google.com/books?id=h3oJBAAAQBAJ>
- Mills-Senn, P. (2013). Taking control of Clery Act Compliance: best practices in campus crime reporting. *University Business*, (8), 26-29.
- Mooketsi, B.E., & Chigona, W. (2016). The impact of contextual factors on the implementation of government e-strategy in previously disadvantaged areas in Cape Town. *The Electronic Journal of Information Systems in Developing Countries*, 73(1), 1-20. <https://doi.org/10.1002/j.1681-4835.2016.tb00529.x>
- National Association for College Admission Counseling. (n.d.). *College size: Small, medium or large?* Retrieved March 15, 2021, from

<https://www.collegedata.com/en/explore-colleges/the-facts-on-fit/features-that-set-colleges-apart/college-size-small-medium-or-large/>

National Center for Campus Public Safety. (2016). *Institutionalizing the Clery Act at institutions of higher education: Findings of a focus group of college and university compliance executives* (Project No. 2013-MU-BX-K011) [Grant]. Bureau of Justice Assistance.

https://www.nccpsafety.org/assets/files/library/Institutionalizing_Clery_Report_FINAL.pdf

Neuendorf, K.A. (2017). *The content analysis guidebook* (2nd ed.). SAGE Publications, Inc.

O'Toole Jr., L.J. (2004). The theory-practice issue in policy implementation research. *Public Administration*, 82(2), 309-329. <https://doi.org/10.1111/j.0033-3298.2004.00396.x>

Owens, K. A. (2008). *Understanding how actors influence policy implementation: A comparative study of wetland restorations in New Jersey, Oregon, The Netherlands and Finland* (Publication No.978-90-365-2698-2) [Doctoral dissertation, University of Twente]. University of Twente. <https://doi.org/10.3990/1.9789036526982>

Owens, K.A. & Bressers, H. (2013). A comparative analysis of how actors implement: Testing the contextual interaction theory in 48 cases of wetland restoration. *Journal of Comparative Policy Analysis: Research and Practice*, 15(3), 203-219. <https://doi.org/10.1080/13876988.2013.785668>

- Owens, K.A. (2016). Balancing environment and business through governance: Nature protection policies in De Alde Feanen National Park, The Netherlands. In D.E. Bromberg (Ed.), *Problem solving with the private sector: A public solutions handbook*. (pp. 81-100). Routledge.
- Paudel, N. R. (2009). A critical account of policy implementation theories: status and reconsideration. *Nepalese Journal of Public Policy and Governance*, 25(2), 36-54.
- Reicher, A. (2017). What's love got to do with it? How current law overlooks the complexities of intimate partner violence on college and university campuses. *Fordham Urban Law Journal*, 44(3), 833-865.
<https://ir.lawnet.fordham.edu/ulj/vol44/iss3/8>
- Reporting and disclosure of information, 34 C.F.R. § 668.41 (2011).
<https://www.govinfo.gov/app/details/CFR-2011-title34-vol3/CFR-2011-title34-vol3-sec668-41>
- Rice, D. (2012). Street-level bureaucrats and the welfare state: Toward a micro-institutionalist theory of policy implementation. *Administration & Society*, 45(9), 1038-1062. <https://doi.org/10.1177/0095399712451895>
- Richardson, B., & Shields, J.A. (2015). The real campus sexual assault problem – and how to fix it: The answer: Social limits, and limits on alcohol. *Commentary*, 140(3), 26-31.

- Sabatier, P.A. (1986). Top-down and bottom-up approaches to implementation research: A critical analysis and suggested synthesis. *Journal of Public Policy*, 6(1), 21-48.
<https://doi.org/10.1017/S0143814X00003846>
- Sabatier, P.A., & Mazmanian, D.A. (1980). The implementation of public policy: A framework for analysis. *Policy Studies Journal*, 8(4), 538-560.
<https://doi.org/10.1111/j.1541-0072.1980.tb01266.x>
- Sav, G. T. (1987). Institutional structure, finance, and race in higher education: Public-private sectoral differences. *Public Choice*, 55(3), 257-264.
<https://doi.org/10.1007/BF00124870>
- Sawilowsky, S.S. (2009). New effect size rules of thumb. *Journal of Modern Applied Statistical Methods*, 8(2), 597-599. <https://doi.org/10.22237/jmasm/1257035100>
- Schrage, J. M., & Giacomini, N. G. (Eds.). (2011). *Reframing campus conflict: Student conduct practice through a social justice lens*. Stylus Publishing.
<https://ebookcentral.proquest.com>
- Simon, M.K. (2011). Assumption, limitations and delimitation. *Dissertation and scholarly research: Recipes for success* (3rd ed., pp. 286-288). Dissertation Success, LLC.
- Smith, M. C. (1989). The ancestry of campus violence. *New Directions for Student Services*, 5(15). <https://doi.org/10.1002/ss.37119894703>
- Stafford, D.A., & DeBowes, M. (2017). Promoting Clery Act compliance: Strategies to improve campus safety, security and transparency. *University Business*, 20(3), 46-47.

Standards of administrative capability, 34 C.F.R. § 668.16 (2011).

<https://www.govinfo.gov/content/pkg/CFR-2011-title34-vol3/pdf/CFR-2011-title34-vol3-sec668-16.pdf>

Stensaker, B. (2015). Organizational identity as a concept for understanding university dynamics. *Higher Education*, 69(1), 103-115.

<http://dx.doi.org.csUMB.idm.oclc.org/10.1007/S10734-014-9763-8>

Stone, M.J., & Petrick, J.F. (2013). The educational benefits of travel experiences: A literature review. *Journal of Travel Research*, 52(6), 731-744.

<https://doi.org/10.1177/0047287513500588>

Student Right-to-Know Act, Pub. L. No. 101-542 (1990).

<https://www.govinfo.gov/content/pkg/STATUTE-104/pdf/STATUTE-104-Pg2381.pdf#page=1>

Student Right-to-Know and Campus Security Technical Amendments, Pub. L. No. 102-26 (1991). [https://www.govinfo.gov/content/pkg/STATUTE-105/pdf/STATUTE-](https://www.govinfo.gov/content/pkg/STATUTE-105/pdf/STATUTE-105-Pg123.pdf#page=6)

[105-Pg123.pdf#page=6](https://www.govinfo.gov/content/pkg/STATUTE-105/pdf/STATUTE-105-Pg123.pdf#page=6)

SurveyMonkey Inc. (2019). *Privacy policy, January 2, 2019*.

<https://www.surveymonkey.com/mp/legal/privacy-policy/>

SurveyMonkey Inc. (2019). *Sample size calculator*. Retrieved April 1, 2019, from

<https://www.surveymonkey.com/mp/sample-size-calculator/>

Sutton, H. (2017). Get a handle on Clery compliance for your campus. *Campus Legal*

Advisor, 17, 1-5. <https://doi.org/10.1002/cal.30512>

Swope, L. (2015). *Developing a clery compliance committee* [White paper]. National Association of Clery Compliance Officers and Professionals.

<https://www.naccop.org/general-resources>

Szafran, R. (2012). *Answering questions with statistics*. SAGE Publications, Inc.

Teixeria, P., Rocha, V., Biscaia, R., & Cadoso, M.F. (2013). Competition and diversification in public and private higher education. *Applied Economics*, 45(35), 4949-4958. <https://doi.org/10.1080/00036846.2013.808310>

Title IV Federal Student Aid Programs, Violence Against Women Act, 79 F.R. 62751 (proposed October 20, 2014) (to be codified at 34 C.F.R. § 668).

<https://www.govinfo.gov/content/pkg/FR-2014-10-20/pdf/2014-24284.pdf>

Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 et seq. (2011).

<https://www.govinfo.gov/content/pkg/USCODE-2011-title20/pdf/USCODE-2011-title20-chap38-sec1681.pdf>

U.S. Department of Education, Office of Civil Rights. (2011). *Dear colleague letter: Sexual violence*. <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>

U.S. Department of Education, Office of Civil Rights. (2017). *Dear colleague letter on campus sexual assault*.

<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-title-ix-201709.pdf>

U.S. Department of Education, Office of Federal Student Aid. (2017). *Program review guide for institutions: Federal student aid (FSA) programs*.

<https://ifap.ed.gov/program-review-guide/06-02-2017-subject-2017-program-review-guide-institutions>

U.S. Department of Education, Office of Federal Student Aid. (2012). *Final program review determination: Dominican College of Blauvelt* [Program Review Control Number: 200930226954].

<https://studentaid.gov/sites/default/files/FPRDDominicanCollegeofBlauvelt.pdf>

U.S. Department of Education, Office of Postsecondary Education. (2016). *The handbook for campus safety and security reporting*.

<https://www2.ed.gov/admins/lead/safety/handbookfsa.pdf>

U.S. Department of Education, Office of Postsecondary Education. (2020). *Campus safety and security data analysis cutting tool*. Retrieved August 14, 2020, from

<https://ope.ed.gov/campussafety/#/>

U.S. Department of Education, Office of Postsecondary Education. (2021, January 19).

Rescission of and replacement for the 2016 handbook for campus safety and security reporting [Press release]. [https://ifap.ed.gov/electronic-](https://ifap.ed.gov/electronic-announcements/100920RescissionReplace2016HandbookForCampusSafetySecurityReporting)

[announcements/100920RescissionReplace2016HandbookForCampusSafetySecurityReporting](https://ifap.ed.gov/electronic-announcements/100920RescissionReplace2016HandbookForCampusSafetySecurityReporting)

[tyReporting](https://ifap.ed.gov/electronic-announcements/100920RescissionReplace2016HandbookForCampusSafetySecurityReporting)

Van Meter, D.S., & Van Horn, C.E. (1975). The policy implementation process: A conceptual framework. *Administration & Society*, 6(4), 445-448.

<https://doi.org/10.1177/009539977500600404>

Vikolainen, V., Bressers, H., & Lulofs, K. (2012). Implementing EU Natura 2000 at the project level: lessons from the Veluwe Border lakes in the Netherlands. *Public*

Administration, 90(4), 1016-1031. <https://doi.org/10.1111/j.1467-9299.2011.01971.x>

Violence Against Women Act, Pub. L. 113-4 (2013).

<https://www.govinfo.gov/content/pkg/PLAW-113publ4/pdf/PLAW-113publ4.pdf>

Virginia State University. (2020). *Student affairs*. Retrieved January 20, 2020, from

<https://www.vsu.edu/about/administrative-offices/student-affairs/index.php>

Walden University, Institutional Review Board. (2020). Research ethics and compliance policies. Retrieved February 5, 2020, from

<https://academicguides.waldenu.edu/research-center/research-ethics/policies>

Wang, J., Gibson, A., Salinas, L., Solis, F., & Slate, J. (2007). Thematic differences in mission statements between four-year public institutions and two-year colleges in Texas. *IEJLL: International Electronic Journal for Leadership in Learning*, 11(1).

Weatherley, R., & Lipsky, M. (1977). Street-level bureaucrats and institutional innovation: Implementing special-education reform. *Harvard educational review*, 47(2), 171-197. <https://doi.org/10.17763/haer.47.2.v870r1v16786270x>

White, L. (2003). Deconstructing the public-private dichotomy in higher education. *Change*, 35(3), 50-54. <https://doi.org/10.1080/00091380309604102>

Woodward, V.H., Pelletier, D., Griffin, O.H., & Harrington, J.R. (2016). University policies and programs for crime prevention awareness: An examination of online reports and resources. *Criminal Justice Review*, 41(2), 140–158. <https://doi.org/10.1177/07340168166634783>

Yudatama, U., Nazief, B. A. A., Hidayanto, A. N., & Mishbah, M. (2017, October 25-26). Factors affecting awareness and attitude of IT governance implementation in the higher education institution: A literature review [Paper presentation]. *3rd International Conference on Science in Information Technology (ICSITech)*, Bandung, Indonesia. <https://doi.org/10.1109/ICSITech.2017.8257181>

Appendix A: Literature Search Strategy

Database	Search Terms	Limiters	Results
ERIC, Walden University	Clery Act	None	29
SAGE Journals, Walden University	Clery Act	None	178
Thoreau Multi-Database Search, Walden University	Clery Act	Full Text, Peer-Reviewed Scholarly Journals	141 after a search with no limiters produced 853 results
ProQuest Dissertations & Theses Global, Walden University	Clery Act	Full Text, Doctoral Dissertations, English, 2010-2017 publication date	729 after limiters without publication date produced 1,628 results
Google Scholar	Clery Act	None	Produced multiple redundancies from previous searches
One Search California State University, Monterey Bay	Clery Act	None	1,943 results with multiple redundancies from previous searches
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	campus crime AND higher education	Full Text, Peer-Reviewed Scholarly Journals; Full-text Online; Peer-Reviewed Journals	1,192; 10,037
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	campus crime AND higher education	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online, Peer-Reviewed Journals, 2010-2017	88; 5,406
Thoreau Multi-Database Search, Walden University; One Search California State	educational leadership AND Higher Education Act	Full Text, Peer-Reviewed Scholarly Journals; Full-text Online, Peer-Reviewed Journals	9; 72,136

University, Monterey Bay			
Thoreau Multi- Database Search, Walden University; One Search California State University, Monterey Bay	Clery Act AND improving compliance	Full Text, Peer Reviewed Scholarly Journals, 2010- 2017; Full-text Online, Peer- Reviewed Journals, 2010-2017	0; 67
Google Scholar	Clery Act AND improving compliance	None; 2010-2017	2,610; 1,810
Thoreau Multi- Database Search, Walden University; One Search California State University, Monterey Bay	Clery Act AND compliance AND administration	Full Text, Peer- Reviewed Scholarly Journals; Full-text Online, Peer- Reviewed Journals	0; 160
Thoreau Multi- Database Search, Walden University; One Search California State University, Monterey Bay	Clery Act AND reporting	Full Text, Peer- Reviewed Scholarly Journals; Full-text Online, Peer- Reviewed Journals	20; 636
Thoreau Multi- Database Search, Walden University; One Search California State University, Monterey Bay; Google Scholar	Contextual Interaction Theory	Full Text, Peer- Reviewed Scholarly Journals; Full-text Online, Peer- Reviewed Journals; 2010-2017	77; 127,260; 305,000
Thoreau Multi- Database Search, Walden University;	policy implementation AND higher education	Full Text, Peer- Reviewed Scholarly Journals, 2010- 2017	1,515
Thoreau Multi- Database Search, Walden University; One Search	organizational identity AND higher education	Full Text, Peer- Reviewed Scholarly Journals, 2010- 2017; Full-text	165; 45,129

California State University, Monterey Bay		Online, Peer-Reviewed Journals, 2010-2017	
One Search California State University, Monterey Bay	strategic management AND higher education	Full-text Online, Peer-Reviewed Journals, 2010-2017	2,141
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	change AND leadership OR governance AND higher education	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online, Peer-Reviewed Journals, 2010-2017	57,268; 279,336
One Search California State University, Monterey Bay; Google Scholar	Higher education governance	Full Text, Peer Reviewed Scholarly Journals; 2010-2017	135,605; 532,000
Thoreau Multi-Database Search, Walden University; Google Scholar	Differences between public and private AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; 2010-2017	719; 76,500
Thoreau Multi-Database Search, Walden University; Google Scholar	Differences between two-year and four-year AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; 2010-2017	5; 68,700
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	campus safety AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online; Peer-Reviewed Journals; 2010-2017	573; 0 (showed expanded results)

Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	campus police AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online; Peer-Reviewed Journals; 2010-2017	230; 7,631,287
One Search California State University, Monterey Bay; Google Scholar	campus police	Full-text Online, Peer-Reviewed Journals; 2010-2019	91,525; 62,300
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	Title IX	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online; Peer-Reviewed Journals; 2010-2017	1,801; 15,639
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	Title IX AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online; Peer-Reviewed Journals; 2010-2017	1,001; 7,3,11,557
Google Scholar	Title IX in higher education	2010 until 2017	20,300
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	student housing OR residential life AND student conduct OR judicial affairs AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online; Peer-Reviewed Journals; 2010-2017	11,939,922; 0 (showed expanded results)

Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	leadership in campus housing	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online, Peer-Reviewed Journals, 2010-2017	5; 3,993
Thoreau Multi-Database Search, Walden University; One Search California State University, Monterey Bay	RA training student housing	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017; Full-text Online, Peer-Reviewed Journals, 2010-2017	0; 0 (showed expanded results)
Thoreau Multi-Database Search, Walden University	Resident advisor AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017	133
Thoreau Multi-Database Search, Walden University	living-learning communities and higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017	212
Google Scholar	the purpose of residence life in higher education	2010 until 2017	17,900
Thoreau Multi-Database Search, Walden University	Student conduct AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017	4,435

Thoreau Multi-Database Search, Walden University	Student conduct OR judicial affairs AND higher education OR college OR university OR post secondary OR postsecondary	Full Text, Peer-Reviewed Scholarly Journals, 2010-2017	4,504
Google Scholar	Student conduct AND higher education OR college OR university OR post secondary OR postsecondary	2010 until 2017	17,100
One Search California State University, Monterey Bay	Trump administration divisive	Full-text Online, Peer-Reviewed Journals	4,862

Appendix B: Permissions to Reprint



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Sender's email address: '[Walden University-issued email address]'

Appendix C: Assumptions of the CIT Frameworks on the Likelihood of Application

The following are the assumptions on what types of interaction to expect under the various combinations of circumstances (between brackets the situations in the flow chart [Figure 2] that rest on this assumption):

- For any interaction to evolve, it is necessary that application of the instrument would contribute positively to the motivation of at least one actor (9, 14).
- If application of the instrument would contribute positively to the objectives of one actor (motivation), while the other actor is also positive or neutral, but the information of the positive actor(s) is insufficient to apply the instrument, than a joint learning process will evolve that will sooner or later create another situation (2, 8).
- If application of the instrument would contribute positively to the objectives of one actor, while the other actor is negative, and the information of the positive actor is insufficient, than there will initially be no interaction, but the positive actor will try to learn on its own and thereby to create another situation (6, 13).
- If application of the instrument would contribute positively to the objectives of one actor, while the other actor is also positive or neutral, and the information of the positive actor(s) is sufficient to apply the instrument, than the interaction process will have the character of cooperation. When both actors are positive there will even be active cooperation (1, 7).
- If application of the instrument would contribute positively to the objectives of one actor, while the other actor is negative, and the information of the positive actor is sufficient, then the character of the interaction process will be dependent on the balance of power between the actors. Dominance of the positive actor will lead to (forced) cooperation (3, 12). Dominance of the negative actor will lead to obstruction (5, 10). A relatively equal balance of power will lead to opposition (4, 11). Opposition can take the forms of negotiation and conflict.

Taken directly from Bressers (2004, p. 312)

Appendix D: Assumptions of the CIT Framework on the Degree of Adequate Application

Following are the assumptions on what types of interaction to expect under the various combinations of circumstances (between brackets the situations in the flow chart [Figure 3] that rest on this assumption):

- If adequate application of the instrument would contribute negatively to the objectives of one actor and also negatively or neutral to the other actor, then obstructive cooperation will evolve. In case both actors are negative this will be even active (obstructive) cooperation (10, 15).
- If adequate application of the instrument would contribute relatively neutral to the objectives of both actors, there will be symbolic interaction (9).
- If adequate application of the instrument would contribute positively to the objectives of one actor and also positively or neutral to the other actor, and these actors have sufficient information, then constructive cooperation will evolve. In case both actors are positive this will even be active (constructive) cooperation (1, 7).
- If adequate application of the instrument would contribute positively to the objectives of at least one actor, but it / they have insufficient information for adequate application, then there will be initially symbolic interaction, but also learning by the positive actor(s), leading later to other situations (6, 8, 14). In case the implementer is positive and the target is also positive or neutral, there will be hardly any symbolic interaction, but very soon a process of joint learning (2), the more so if the target is also positive.
- If adequate application of the instrument would contribute positively to the objectives of one actor and negatively to the other actor, and the positive actor has sufficient information, than the character of the interaction process will be dependent on the balance of power between the actors. Dominance of the positive actor will lead to (forced) constructive cooperation (3, 13). Dominance of the negative actor will lead to negotiation (5, 11 – not obstructive cooperation since by nature of this aspect some sort of application will result anyhow). A relatively equal balance of power will lead to negotiation or conflict (4, 12).

Taken directly from Bressers (2004, pp. 313-314)

Appendix E: Universal Request Email to Partner in Doctoral Research

Good day,

My name is Shanieka Jones, and I am a doctoral student at Walden University. I am a student in the Ph.D. in Public Policy and Administration program with a specialization in Public Management and Leadership. I am conducting a research study, and **require your assistance in reaching your U.S. institutions with membership.**

You may know that the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* (Clery Act, 20 U.S.C. § 1092(f)), requires any U.S. postsecondary institution that receives federal funds to student education to meet a variety of requirements surrounding campus safety. Perhaps the most known requirement is the publication of an annual security report, which contains information regarding campus security and personal safety. Also enclosed are statistical disclosures for a variety of criminal offenses for the three previous calendar years. Recent best practice recommendations call for an institutional response to the Act's regulatory demands, which is referred to in my study as a Clery-compliance team (CCT). This team can be characterized as a cross-departmental collaborative group that is supported by high-level institutional administrators that build durable relationships. They also share a vision and mission, have clear communication, and contribute resources towards a comprehensive Clery Act compliance action plan. Through the work of a subject-matter lead CCT, results and rewards are shared, thus making the professional risk high for all those involved. As a result, the CCT mitigates compliance risk effectively and throughout the calendar year.

The purpose of this study is to expand knowledge on the effects of the Clery Act in higher education under the lens of policy implementation by examining the relationship between actor characteristics (motivation, information, and power) and noncompliance.

My Walden University approval number for this study is 08-23-19-0613926, and it expires on August 22, 2020. The participation of your interested members will only take place during the study's active IRB approval period, and all activities will cease if IRB approval expires or is suspended.

For your review, I have attached a copy of the survey (PDF version), which includes a copy of the Consent and Privacy Statement. Also attached is a draft of the invitation letter that you would send to your membership on my behalf. The invitation letter is open for revision to ensure your organization's comfort. Upon its approval and should you agree to be a partnering organization, the preferred method of delivery is to include its text via email.

Please contact me if you have any questions or concerns. Otherwise, please respond and indicate whether the [name of organization] agrees to the terms and conditions necessary for me to conduct my study (i.e., [name of organization] will contact its U.S. institutional membership on my behalf using the agreed-upon invitation letter and sending method).

I look forward to your response.

--

Shanieka S. Jones, M.S.

Walden University

Ph.D. in Public Policy and Administration – Public Management and Leadership

Appendix F: Association A Agreement to Become a Partnering Organization

11/27/2019

[Name],

[Name] and I have agreed to allow a current [Association A] member (and doctoral student), Shanika Jones, to access [Association A] members and invite them to participate in a survey Shanika is conducting in partial fulfillment of her doctoral degree requirements. We will need you to distribute the initial email invitation to all current Institutional Members (no one else) on **Monday, December 2**, and a reminder should be sent on **January 6, 2020**.

Please use the attached letters, which Shanika has provided, for these purposes. Shanika has provided us with the language she'd like you to use in both the subject line for the email as well as the body of the email (just do me a favor and fix the word "Professional" in the emails to read "Professionals" when referring to the name of [Association A]). You should send the email under my name and signature when you send the emails through [software]. The invitation and reminder should not identify Shanika by name (you'll see she has constructed the emails in a way that specifically avoids identifying her).

I am copying Shanika here in case you have any other questions for her. I strongly suspect she will need to know how many Institutional Members this is sent to on Monday December 2 so she can calculate a response rate to report in her dissertation. It may also be useful if you can tell her whether we get any bounce-backs in case she decides to remove those from her numbers when calculating the response rate (if this type of data is easily obtainable when we send the invitations – I'm not sure).

Thanks in advance for your help!

Regards,

[Name and Signature]

Appendix G: Invitation to Participate

Email Subject: Invitation to Participate in Doctoral Research on the Clery Act

Dear [Association A] Member,

You are invited to take part in a research study that partially fulfills the requirements for the degree of Doctor of Philosophy in Public Policy and Administration at Walden University. The research is about the influence of networks and governance among campus partners to implement campus safety policy effectively.

You may find that your role falls in university police, Title IX, student housing, judicial affairs, or otherwise in student affairs; and therefore one of the following memberships: [list of targeted IHE professional associations]. Whatever your part, your department is a critical aspect in contributing to your institution's overall compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*, and your perceptions are valued!

The researcher, who is a Clery Act practitioner, has requested we contact members to avoid any conflict of interest that would arise by providing the names to them directly, some of whom may be known colleagues. It should take approximately 18 minutes to complete the questionnaire. Your responses will be used to support this research in hopes of igniting social change by providing practitioners with information regarding the extent to which an organizational and structural environment can influence responsibilities to encourage building effective partnerships and considering environmental context to strategic initiatives.

If you are interested, please click the link below to be directed to the Consent and Privacy Statement before beginning the survey – this does not commit you to starting or completing the survey:

I'm interested [hyperlinked to appropriate survey via custom URL]

Or copy and paste the URL below into your preferred internet browser:

[hyperlink to appropriate survey via custom URL]

Otherwise, you can disregard this invitation. If you have questions, you may contact the researcher via email at [Walden University-issued email address]. If you want to talk privately about your rights as a participant, you can call the Research Participant Advocate at Walden University at 612-312-1210. Walden University's approval number for this study is 08-23-19-0613926 and it expires on August 22, 2020.

[Signature of Sender from Partnering Organization has been withheld to protect their privacy]

Appendix H: Survey Instrument

Understanding Higher Education Clery Act Compliance Teams

Consent and Privacy Statement

You may find that your role falls in university police, Title IX, student housing, judicial affairs, or otherwise in student affairs; and are therefore invited to take part in a research study that partially fulfills the requirements for the degree of Doctor of Philosophy in Public Policy and Administration at Walden University. The research is about the influence of networks and governance among campus partners to implement campus safety policy effectively. The researcher is inviting members of campus communities to be in a nationwide study. This form is part of a process called "informed consent" to allow you to understand this study before deciding whether to take part.

Background Information:

The *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* (Clery Act, 20 U.S.C. § 1092(f)), requires any U.S. postsecondary institution that receives federal funds to student education must meet a variety of requirements surrounding campus safety. Perhaps the most known requirement is the publication of an annual security report, which contains information regarding campus security and personal safety. Also enclosed are statistical disclosures for a variety of criminal offenses for the three-previous calendar years. Recent best practice recommendations call for an institutional response to the Act's regulatory demands through the structuring of a Clery Compliance Team (CCT), or as a cross-departmental team who is supported by high-level institutional administrators that is comprised of campus partners who work collaboratively to build durable relationships, share a vision and mission, have well-defined communication, and contribute resources towards a comprehensive Clery Act compliance action plan. Through the work of a CCT that is led by a subject-matter expert, the results and rewards are shared, thus making the professional risk high for all those involved yet, as a result, the CCT mitigates compliance risk effectively and throughout the calendar year.

The purpose of this study is to expand knowledge on the effects of the Clery Act in higher education under the lens of policy implementation by examining the relationship between actor characteristics and noncompliance variables.

Procedures:

If you agree to be in this study, you will be asked to:

1. Take a 43-item questionnaire, taking approximately 18 minutes to complete
2. You can only take the survey once and will be unable to edit your responses once submitted

Here are some sample questions:

- Does your campus have a Clery Compliance Officer?
- Which description closely describes your institution's method of addressing Clery Act compliance?
- When deciding on approaches to meet Clery Act requirements, how reliant on you on others for information?

Voluntary Nature of the Study:

This study is voluntary. You are free to accept or turn down the invitation. No one will treat you differently if you decide not to be in the study. If you decide to be in the study now, you can still change your mind later. You may stop at any time.

Risks and Benefits of Being in the Study:

Being in this type of study involves some risk of minor discomfort that can be encountered in your daily work-life. Examples of such include becoming upset or feeling uncomfortable about the experiences and interactions faced while performing job functions. Being in this study would not pose risk to your safety or wellbeing.

This research intends to provide administrators of higher education with data to develop strategic initiatives that address Clery Act compliance deficiencies. The results of this study may ignite social change by providing practitioners with information regarding the extent to which an organizational and structural environment can influence responsibilities. These insights may aid administrators in shifting cultural paradigms and help them understand the divisional areas responsible for identifying and developing programming for legislative discrepancies.

Payment:

While your time and participation are valued, you will not be paid or otherwise compensated for taking part in this study.

Privacy:

Reports coming out of this study will not share the identities of individual participants or their institutions. Details that might identify participants/institutions, such as the position title, email address, or name of institution, also will not be shared. The researcher will not use your personal information for any purpose outside of this research project, and such information will be presented as collective results. Data will be kept for the duration of the completion of this degree requirement or for a period of at least 5 years, as required by the university, whichever is designated by the Walden University Institutional Review Board for Ethical Standards in Research.

For additional information regarding the SurveyMonkey Privacy Policy, please click [here](#).

Contacts and Questions:

If you have questions, you may contact the researcher via email at shanieka.jones@waldenu.edu. If you want to talk privately about your rights as a participant, you can call the Research Participant Advocate at Walden University at 612-312-1210. Walden University's approval number for this study is 08-23-19-0613926 and it expires on August 22, 2020.

To print this consent form for your records, please click [here](#).

* 1. If you feel you understand the study well enough to make a decision about it, please indicate your consent by clicking the box marked "Yes, I voluntarily give my consent" to begin. Otherwise, select, "No, I do not give my consent."

Yes, I voluntarily give my consent

No, I do not give my consent

Understanding Higher Education Clery Act Compliance Teams

Demographic Questions

To answer the demographic questions accurately, you are encouraged to visit the National Center

for Education Statistics College Navigator by copying and pasting the following link into a separate browser tab: <https://nces.ed.gov/collegenavigator/>. This is not a requirement for your responses to be accepted.

These 10 questions are being asked only to identify trends across campus types. Neither you nor your institution can be identified by answering these questions and your responses will be presented collectively in the research results.

2. What percentage of students at your institution receives Title IV, Federal Student Aid (FSA)?

- 1% – 24%
 75% – 100%
- 25% – 49%
 My institution does not participate in any U.S. federal student assistance program
- 50% – 74%

3. Does your institution have a deferment-only status (i.e., **does not provide student loans or grants** through Title IV programs but does have students who are eligible to defer federal student loans while they are enrolled) or is a distance education-only (**students are never present on a physical campus**) institution?

- Yes
 No

4. What is the setting of your main campus?

- Rural (Territory that ranges in distance from less than 5 miles to more than 25 miles from an urbanized area, as well as being less than 2.5 miles to more than 10 miles from an urban cluster)
- Town (Territory inside an urban cluster that ranges in distance or less than 10 miles to more than 35 miles from an urbanized area)
- Suburban (Territory outside a principal city and inside an urbanized area with a population ranging from less than 100,000 to one of more than 250,000)
- City (Territory inside an urbanized area and inside a principal city with a population ranging from less than 100,000 to one of more than 250,000)

5. What is your institution's sector?

- Public, 4-year or above
 Private, For-profit, 2-year
- Private, Non-profit, 4-year or above
 Public, less-than-2-year
- Private, For-profit, 4-year or above
 Private, Non-profit, less-than-2-year
- Public, 2-year
 Private, For-profit, less-than-2-year
- Private, Non-profit, 2-year

6. Does your institution have a religious affiliation or a specialized mission (i.e., single-sex, Historically Black College or University, Tribal college)?

- Yes, my institution has a religious affiliation
- Yes, my institution has a specialized mission
- Yes, my institution has both a religious affiliation and specialized mission
- No

7. What is the highest level of award your institution offers?

- Advanced (includes Master's and doctoral degrees, post-baccalaureate and post-Master's certificates)
- Bachelor's
- Associate's
- Certificate

8. Currently, what is your current total student enrollment by headcount (If your institution has multiple campuses, include the total enrollment of all campuses combined)?

- Less than 500
- Between 500 and 4,999
- Between 5,000 and 9,499
- Between 9,500 and 13,999
- Between 14,000 and 18,499
- Between 18,500 and 22,999
- Between 23,000 and 27,499
- Between 27,500 and 31,999
- 32,000 and greater

9. Does your institution have on-campus student housing (to include any campus for a multiple campus institution)?

- Yes
- No

10. Does your institution have a study-abroad program?

- Yes
- No

11. What is your position/area at your campus?

- Clery Compliance Officer

 Student Conduct Administrator/Judicial Affairs
 Campus police or security

 Student housing
 Title IX Coordinator

 Student life

Other (please specify)

Understanding Higher Education Clery Act Compliance Teams

Gauging Institutional Support Towards Clery Act Compliance

The following 10 questions are being asked to identify your main campus's foundational support. Neither you nor your institution can be identified by answering these questions and your responses will be presented collectively in the research results.

12. Does your campus have a Clery Compliance Officer (i.e., a subject-matter expert responsible for meeting the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act)?

- Yes
 No
 Unsure

13. If Yes, what level of commitment describes their position?

- Part-time, collateral duty (being a Clery Compliance Officer lies outside of or is shared with your main role/position)
 Full-time, collateral duty (being a Clery Compliance Officer lies outside of or is shared with your main role/position)
 Part-time, dedicated position
 Full-time, dedicated position
 Unsure

14. Which description closely describes your institution's method of addressing Clery Act compliance?

- A committee, team, or workgroup that is officially recognized by leadership with formal rules and operational guidelines/protocol that structure its practices who meet regularly (i.e., weekly, monthly, quarterly) and have a collaborative relationship
- An ad-hoc committee, team or workgroup that has some support from leadership with few campus rules and guidelines that structure its practices who meet as needed and have a cooperative relationship
- Few campus partners who communicate most during the summer months that have no institutional support or governing documents aside from the Clery Act and its regulations
- Unsure

Other (please specify)

15. Think about whether any internal discussions have taken place in regards to Clery's operational needs. Has senior leadership (i.e., President, Provost, Vice Presidents, Associate Vice Presidents) stated whether having a Clery Compliance Team (CCT) is necessary?

- Yes
- No
- Unsure

16. Has senior leadership made their support clear to those employees directly impacted by the Clery Act?

- Yes
- No
- They have made their support known to some but not all
- Unsure

17. Do senior leadership's beliefs about your campus's CCT match its actual mission?

- A Great Deal
- Much
- Somewhat
- Little
- They do not match.
- Unsure

18. What do you believe is the purpose of the Clery Act?

- To provide prospective students and employees with accurate accounts of the extent and nature of campus crime when choosing whether to be a member of the community
- To create daunting pressures on postsecondary institution regarding campus safety and security measures
- Both
- I am unsure/I do not know

Other (please specify)

19. What is your leading perception for each involved actor regarding their involvement towards institutional Clery Act compliance efforts at your campus (Context – Concerned most about the effects Clery Act compliance has on their department or position; Process – Concerned most about their role in decision-making). Circle one response for each position.

	Context	Process	Unsure	None/NA
Campus	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Police/Security Officer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local Police	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Title IX Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Conduct/Judicial Affairs Administrator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Activities/Student Life staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Housing staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. Have you attended a training that addressed Clery Act requirements?

- Yes
- No

21. If yes, how long ago was your training?

- 1 – 11 months
- 1 year – 23 months
- 2 years – 35 months
- 3 years – 47 months
- 4 years – 59 months
- 5 years or longer

Understanding Higher Education Clery Act Compliance Teams

Understanding Contextual Factors Surrounding a Clery Compliance Team (CCT)

The remaining questions are being asked to describe your campus's cross-departmental interactions surrounding Clery Act compliance. Neither you nor your institution can be identified by answering these questions and your responses will be presented collectively in the research results.

22. Are the goals of the Clery Compliance Team (CCT)/committee/workgroup (formal, ad-hoc, or otherwise) specific?

- Yes
- No
- Unsure

23. Do you believe you or your department is obligated to participate in Clery Act compliance efforts?

- Yes
- No
- Unsure

24. In your opinion, how are the following campus partners impacted by the implementation of a CCT (i.e., whose processes will improve and who will be burdened)?

	Positive	Negative	Neutral
Campus Police/Security Officer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local Police	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Title IX Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Conduct/Judicial Affairs Administrator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Conduct/Judicial Affairs Administrator Student Activities/Student Life staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student Housing staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

25. Does your campus community value the product of its institution meeting the Clery Act's requirements?

- Yes
 No
 Unsure

26. Has the reaction of the community (campus, public, media) directed any future efforts after meeting a Clery Act requirement (e.g., hosting a public forum after issuing a Timely Warning)?

- Yes
 No
 Somewhat
 Unsure

27. Does your particular position or department have goals regarding its contribution to your campus's Clery Act compliance efforts?

- Yes
 No
 Unsure

28. If something is important to you or your department regarding your campus's responsibility to the Clery Act and other campus partners with responsibility disagree, what do you believe are your chances of attaining the goals important to you?

- Very likely
- Likely
- Maybe (50/50)
- Unlikely
- Very unlikely

29. Which do you or your department value more as it relates to the purposes of the Clery Act?

- Meeting federal regulatory requirements
- I/My department value neither
- Maintaining a safe and secure campus environment
- Unsure
- I/My department value both equally

Other (please specify)

30. Are there any policies or structures to ensure your campus complies with the Clery Act or otherwise maintain a safe and secure campus (to include system-wide policies and structures if you belong to a university or college system)?

- Yes
- No
- Unsure

31. Does your state have state legislation or conduct state-level program reviews or audits to reinforce Clery Act requirements or otherwise evaluate the institution's processes for maintaining a safe and secure campus?

- Yes, there is **state legislation** to ensure individual campuses comply with the Clery Act or otherwise maintain a safe and secure campus
- Yes, **state-conducted program reviews or audits** separate from the Department of Education are implemented to ensure individual campuses comply with the Clery Act or otherwise maintain a safe and secure campus
- Yes, **my campus is impacted by both** state legislation and state-conducted program reviews or program reviews to ensure individual campuses comply with the Clery Act or otherwise maintain a safe and secure campus
- No
- Unsure

32. Do you know the codes and sections of the Clery Act's requirements that pertain to your area of compliance (e.g. Emergency Notification, Evacuation, and Response)?

- Yes
- No
- Some, but not all
- Unsure

33. Are the operational expectations to meet the Clery Act's requirements clear to you?

- Yes
- No
- Somewhat

34. What elements of Clery Act compliance are you or your department responsible for fulfilling (Select all that apply)?

- Compiling, Classifying, and Counting Crime Statistics (includes types of crime and Clery geography)
- Maintain the campus crime log
- Issuing Timely Warning
- Initiating Emergency Notifications
- Provide educational programs and campaigns
- Carry-out the procedures regarding institutional disciplinary action in cases of dating violence, domestic violence, sexual assault, and stalking
- Publish and/or disseminate the Annual Security Report
- Compile and disclose information for student-housing fires
- Publish and/or disseminate the Annual Fire Safety Report
- Submit crime and/or fire statistics to the Department of Education

35. What is your/your department's level of authority over these tasks?

- I am responsible for fulfilling most/all of these requirements myself with little to no intra-department collaboration
- My department and the Clery Compliance Officer divide authority over tasks as appropriate
- A Clery Compliance Officer works with us to assess our procedures and make improvements, and reviews reports for statistical accuracy
- Unsure
- We submit our work (i.e., logs, copies of Timely Warnings and publication of tests, statistics in the form of numbers, etc.) towards our requirements to the Clery Compliance Officer who accepts them as-is.

36. When deciding on approaches to meet Clery Act requirements, how reliant on you on others for information?

- Extremely Reliant
- Very Reliant
- Quite Reliant
- Somewhat Reliant
- Not at all Reliant

37. How would you describe the information (e.g., updates on campus projects or the development of campus policy, updates on legislation, released whitepapers, etc.) you or your department receives about the institution's efforts towards Clery Act compliance?

- Detailed and frequent
- Detailed and intermittent
- Vague but frequent
- Vague and intermittent
- Neither my department nor I receive information about the institution's efforts towards Clery Act compliance.
- Unsure

38. How would you best describe the relationship between yourself and the CCT/committee/workgroup members or campus partners?

- Everyone is equally transparent with information
- There are some more transparent than others with the information at their disposal
- Everyone is equally particular with what and when they share information

39. Are there uncertainties that prohibit your participation among institutional compliance efforts?

- Yes
- No

40. Does your involvement in your campus's institutional efforts towards Clery Act compliance involve a financial commitment (to include training)?

- Yes, out of my department's budget
- Yes, but out of a divisional (e.g., Student Affairs, Administration & Finance, etc.) or umbrella budget
- No, the office primarily responsible for Clery Act compliance remunerates all costs
- No, there is no financial commitment needed based on how my campus addresses Clery Act compliance

41. If there is no financial commitment for you or your department, please indicate how else you contribute to the institutional effort:

42. Did you ever experience needing resources (i.e., training, guidance on a particular issue, templates, etc.) of which you were not given access to during a compliance year (e.g., in 2019 while compiling data for or publishing the Annual Security Report)?

Yes

No

43. If yes, was this issue ever discuss or resolved?

Discussed but Not (Yet) Resolved

Discussed and Resolved

No

44. Whom do you think is viewed by the public as the **position or department** primarily responsible for the institution's Clery Act compliance?

Appendix I: Disqualification Page

You are receiving this notice of disqualification because you either have selected **not** to participate or indicated your institution is exempt from complying with the Clery Act.

If you decided not to participate but later change your mind, please contact the researcher at [Walden University-issued email address].

A copy of your statement of declination will not be sent to you. You are encouraged to print this page for your records. You can close out of the survey by closing your browser.

Appendix J: Survey End Page:

Thank you for participating!

Because the associated research is about the influence of networks and governance among campus partners to implement Clery Act policy effectively, your responses will be used in support, in hopes of igniting social change at the campus level. Through this study, practitioners are provided with information about the extent to which an organizational and structural environment can influence responsibilities and are hopefully encouraged to build effective partnerships and consider environmental context to strategic initiatives.

Appendix K: Conceptualization of Variables

The following chart is the conceptualization of the motivation, information, and power variables and how data for each variable was gathered through questions within the survey.

Conceptualization of Motivation Variable

	Question	Survey Question #
Respondent Self-Motivation		
Compatibility with implementation goals	Are the goals of the Clery-compliance team (CCT)/committee/workgroup (formal, ad-hoc, or otherwise) specific?	22
Work-related motivation	Does your particular position or department have goals regarding its contribution to your campus's Clery Act compliance efforts?	27
Attitude toward other stakeholders	In your opinion, how are the following campus partners impacted by the implementation of a CCT (i.e., whose processes will improve and who will be burdened)?	24
Attitude toward the program objective	Which do you or your department value more as it relates to the purposes of the Clery Act?	29
Self-effectiveness	If something is important to you or your department regarding your campus's responsibility to the Clery Act and other campus partners with responsibility disagree, what do you believe are your chances of attaining the goals important to you?	28
Wider Contexts		
Normative	Do senior leadership's beliefs about your campus's CCT match its actual mission?	17, 23

	Do you believe you or your department is obligated to participate in Clery Act compliance efforts?	
Cultural	Does your campus value the product of its institution meeting the Clery Act requirements?	25
Social	Has the reaction of the community (campus, public, media) directed any future efforts after meeting a Clery Act requirement (e.g., hosting a public forum after issuing a Timely Warning)?	26
Political	<p>Think about whether any internal discussions have taken place in regards to Clery's operational needs. Has senior leadership (i.e., President, Provost, Vice Presidents, Associate Vice Presidents) stated whether having a Clery-compliance team (CCT) is necessary?</p> <p>Has senior leadership made their support clear to those employees directly impacted by the Clery Act?</p> <p>Are there any policies or structures to ensure your campus complies with Clery Act or otherwise maintain a safe and secure campus (to include system-wide policies and structures if you belong to a university or college system)?</p> <p>Does your state have state legislation or conduct state-level program reviews or audits to reinforce Clery Act requirements or otherwise evaluate the institution's processes for maintaining a safe and secure campus?</p>	15, 16, 30, 31

Conceptualization of Information Variable

	Question	Survey Question #
General Information		
Policy awareness	Do you know the codes and sections of the Act's requirements that pertain to your area of compliance (e.g., Emergency Notification, Evacuation, and Response)?	32
Policy requirements	Are the operational expectations to meet the Act's requirements clear to you?	33
Policy benefits	What do you believe is the purpose of the Clery Act?	18
Knowledge of stakeholders and qualifications	<p>What is your leading perception for each involved actor regarding their involvement towards institutional Clery Act compliance efforts at your campus (Context – Concerned <u>most</u> about the effects Clery Act compliance has on their department or position; Process – Concerned <u>most</u> about their role in decision-making). Circle one response for each position.</p> <p>Have you attended a training that addressed Clery Act requirements?</p> <p>If yes, how long ago was your training?</p>	19, 20, 21
Transparency		
Documentation, including lack of	How would you describe the information (e.g., updates on campus projects or the development of campus policy, updates on legislation, released whitepapers, etc.) you or your department receives about the institution's efforts towards Clery Act compliance?	37

Conceptualization of Information Variable

	Question	Survey Question #
Transparency		
Accessibility, including lack of	When deciding on approaches to meet Clery Act requirements, how reliant are you on others for information? How would you best describe the relationship between yourself and the team/committee/workgroup members or campus partners?	36, 38
Process complexities, uncertainties	Are there uncertainties that prohibit your participation among institutional compliance efforts?	39

Conceptualization of Power Variable

	Question	Survey Question #
Capacity		
Resources	Does your involvement in your campus's institutional efforts towards Clery Act compliance involve a financial commitment (to include training)?	40
Lack of Resources	Did you ever experience needing resources (i.e., training, guidance on a particular issue, templates, etc.) of which you were not given access to during a compliance year (e.g., in 2019 while compiling data for or publishing the Annual Security Report)? If yes, was this issue ever discuss or resolved?	42, 43

Conceptualization of Power Variable

	Question	Survey Question #
Control		
Formal	<p>Does your campus have a Clery Compliance Officer (i.e., a subject-matter expert responsible for meeting the requirements of the <i>Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act</i>)?</p> <p>If yes, what level of commitment describes their position?</p> <p>What elements of Clery Act compliance are you or your department responsible for fulfilling (Select all that apply)?</p> <p>What is your level of authority over these tasks?</p>	12, 13, 34, 35
Informal	If there is no financial commitment for you or your department, please indicate how else you contribute to the institutional effort:	41
Reputation of Power	<p>Which description closely describes your institution's method of addressing Clery Act compliance?</p> <p>Whom do you think is viewed by the public as the position or department primarily responsible for the institution's Clery Act compliance?</p>	14, 44

Appendix L: Scoring through Participant Responses

The following questions and possible response measure the **motivation** variable as they relate to **likelihood of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
15	Yes	+
	No	-
	Unsure	0
16	Yes	+
	No	-
	They have made their support known to some but not all	0
	Unsure	0
17	A Great Deal	+
	Much	+
	Somewhat	0
	Little	-
	They do not match.	-
	Unsure	0

The following questions and possible response measure the **information** variable as they relate to **likelihood of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
18	To provide prospective students and employees with accurate accounts of the extent and nature of campus crime when choosing whether to be a member of the community	+
	To create daunting pressures on postsecondary institution regarding campus safety and security measures	-
	Both	0
	I am unsure/I do not know	0
	Other (please specify)	DOR
19	Context	-
	Process	+
	Unsure	0
	None or N/A	-
20	Yes	+
	No	-
21	1 – 11 months	-
	1 year – 23 months	+

	2 years – 35 months	+
	3 years – 47 months	+
	4 years – 59 months	+
	5 years or longer	+

The following questions and possible response measure the **power** variable as they relate to **likelihood of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
12	Yes	+
	No	–
	Unsure	0
13	Part-time, collateral duty (being a Clery Compliance Officer lies outside of or is shared with their main role/position)	–
	Full-time, collateral duty (being a Clery Compliance Officer lies outside of or is shared with their main role/position)	–
	Part-time, dedicated position	–
	Full-time, dedicated position	+
	Unsure	0

The following questions and possible response measure the **motivation** variable as they relate to **degree of adequate of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
22	Yes	+
	No	–
	Unsure	0
23	Yes	+
	No	–
	Unsure	0
24	Positive	+
	Negative	–
	Neutral	0
25	Yes	+
	No	–
	Unsure	0
26	Yes	+
	No	–

	Somewhat	0
	Unsure	0
27	Yes	+
	No	-
28	Unsure	0
	Very likely	+
	Likely	+
	Maybe (50/50)	0
	Unlikely	-
29	Very unlikely	-
	Meeting federal regulatory requirements	0
	Maintaining a safe and secure campus environment	0
	I/My department value both equally	+
	I/My department value neither	-
	Unsure	0
30	Other (please specify):	DOR
	Yes	+
	No	-
31	Unsure	0
	Yes, there is state legislation to ensure individual campuses comply with Clery Act or otherwise maintain a safe and secure campus	+
	Yes, state-conducted program reviews or audits separate from the Department of Education are implemented to ensure individual campuses comply with Clery Act or otherwise maintain a safe and secure campus	+
	Yes, my campus is impacted by both state legislation and state-conducted program reviews to ensure individual campuses comply with the Clery Act or otherwise maintain a safe and secure campus	+
	No	0
	Unsure	0

The following questions and possible response measure the **information** variable as they relate to **degree of adequate of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
32	Yes	+
	No	-
	Some, but not all	0

	Unsure	0
33	Yes	+
	No	-
	Somewhat	0
	Extremely Reliant	-
36	Very Reliant	-
	Quite Reliant	0
	Somewhat Reliant	+
	Not at all Reliant	+
	Detailed and frequent	+
37	Detailed and intermittent	+
	Vague but frequent	-
	Vague and intermittent	-
	Neither my department nor I receive information about the institution's efforts towards Clery Act compliance.	-
	Unsure	0
	Everyone is equally transparent with information	+
38	There are some more transparent than others with the information at their disposal	-
	Everyone is equally particular with what and when they share information	0
	Yes	-
39	No	+

The following questions and possible response measure the **power** variable as they relate to **degree of adequate of application** of a Clery-compliance team at an institution of higher education.

Question #	Possible Response	Score
14	A committee, team, or workgroup that is officially recognized by leadership with formal rules and operational guidelines/protocol that structure its practices who meet regularly (i.e., weekly, monthly, quarterly) and have a collaborative relationship	+
	An ad-hoc committee, team or workgroup that has some support from leadership with few campus rules and guidelines that structure its practices who meet as needed and have a cooperative relationship	+
	Few campus partners who communicate most during the summer months that have no institutional support or governing documents aside from the Clery Act and its regulations	-
	Unsure	0

	Other (please specify):	DOR
	Compiling, Classifying, and Counting Crime Statistics (includes types of crime and geography)	DOR
	Maintain the campus crime log	DOR
	Issuing Timely Warning	DOR
	Initiating Emergency Notifications	DOR
	Provide educational programs and campaigns	DOR
34	Carry-out the procedures regarding institutional disciplinary action in cases of dating violence, domestic violence, sexual assault, and stalking	DOR
	Publish and/or disseminate the Annual Security Report	DOR
	Compile and disclose information for student-housing fires	DOR
	Publish and/or disseminate the Annual Fire Safety Report	DOR
	Submit crime and/or fire statistics to the Department of Education	DOR
	I am responsible for fulfilling most/all of these requirements myself with little to no intra-department collaboration	-
	A Clery Compliance Officer works with us to assess our procedures and make improvements, and reviews reports for statistical accuracy	+
35	We submit our work (i.e., logs, copies of Timely Warnings and publication of tests, statistics in the form of numbers, etc.) towards our requirements to the Clery Compliance Officer who accepts them as-is	-
	My department and the Clery Compliance Officer divide authority over tasks as appropriate	+
	Unsure	0
	Yes, out of my department's budget	+
	Yes, but out of a divisional (e.g., Student Affairs, Administration & Finance, etc.) or umbrella budget	+
40	No, the office primarily responsible for Clery Act compliance remunerates all costs	-
	No, there is no financial commitment needed based on how my campus addresses Clery Act compliance	-
41	<i>(Open-ended response)</i>	DOR
42	Yes	-
	No	+
43	Discussed but Not (Yet) Resolved	0
	Discussed and Resolved	+
	No	-
44	<i>(Open-ended response)</i>	DOR

Appendix M: Context Analysis Full Coding Scheme

Category	Keywords and Phrases		
Motivation	Leadership	inconsistent_guidance_support	purpose_proper_administration
	Goal*	purpose_clery_act_report	additional_police_support
	Culture_value*	express*_purpose	support_existing_force
	Value*_campus_community	Incentive*	support_structure
	purpose_meeting_requirement	Commitment*	support_compliance_efforts
	undermine*_purpose	Priority	support_enhance_campus_safety
	Willing*	Priorities	adequate_coordination_oversight_supervision
	Collaboration	Administrative_Failure*	continuous_improvement_additional_support
Coordination	Participate	purpose_demonstrating_compliance	
Information	Sufficient_knowledge	received_training	Reliant
	requisite_knowledge	report_writing_training	relationship*_between
	equipped_knowledge	training_opportunities	relationship*_with
	working_knowledge	lack_training	dotted-line_relationship*
	required_knowledge	no_training_provided	largely_dependent
	lack_knowledge	adequate_training	Interpretation
	knowledge_requirements	mean*_communication	Understanding
	knowledge_understanding	mode*_communication	Clarity
	limited_knowledge	unconditional_communication	Accuracy
	had_knowledge	transparent_communication	annual_training
	Adequate_communication	inadequate_communication	training_programs
	adequate_custody	clear_communication	training_initiative*
	data_integrity	approving_communication	training_improvements
	internal_control*	effective_communication	compliance_staff_training
	quality_control	requisite_communication	institutional_training
	adequate_program_materials	lack_communication	steps_improve_training

Category	Keywords and Phrases		
Information	adequate_plan lack_adequate_documentation minimally_adequate Documentation maintain_adequate_documentation	memo_understanding Number of Qualified Persons Department_provides_number_Clery	Clery_Act_training training_staff_members Act_training_resources
Power	checks_balance act*_resource inadequate*_resource* resource*_prevent recurrence* adequate_resource* authority_resource* budgetary_resource* Capacity Clery_Coordinator ownership_control	inadequate_supervisory additional_personnel personnel_changes understaff* expand*_personnel manpower_resource no_personnel oversight_supervision personnel_assigned administrative_authority	authority_gather authority_oversee authority_arrest authority_act authority_issue authority_require authority_determine authority_compel custody_control assert_control
Finding*	violation*_recur these_violation* those_violation* violation*_weakness aforementioned_violation* identified_violation* violation*_underlying violation*_documented systemic_violation* serious_consequence* serious_violation* multiple_violation*	deficiencies_weakness organizational_weakness systemic_weakness recordkeeping_weakness correct_improve examine_improve re-examine_improve improve_policies improve_operation* improve_issuance improve_overall_compliance impose_fine	Discrepancy Discrepancies Inaccurate corrective_action_plan* corrective_action*_required corrective_action_requirement* take_necessary_corrective require_additional_corrective_action* administrative_weakness Deficiency Deficient Failure*

Category	Keywords and Phrases		
Finding*	separate_distinct_violation* violation*_identified violation*_noted	improve_processes improve_training improve_program	impose_disciplinary_sanction* impose_adverse_administrative_action improve_campus_security_operation*

Appendix N: Universal Facebook Open Invitation to Participate in Doctoral Research

Are you a [inserted title as appropriate (e.g., Title IX Coordinator/Investigator, student housing professional, student conduct professional, campus police/safety professional, student affairs professional)] with responsibility to your institution's compliance with the Clery Act?

You are invited to take part in a research study that partially fulfills the requirements for the degree of Doctor of Philosophy in Public Policy and Administration at Walden University. The research is about the influence of networks and governance among campus partners to implement campus safety policy effectively. It should take approximately 18 minutes to complete the questionnaire. Your responses will be used to support this research in hopes of igniting social change by providing practitioners with information regarding the extent to which an organizational and structural environment can influence responsibilities to encourage building effective partnerships and considering environmental context to strategic initiatives.

If you are interested, please click the link below to be directed to the Consent and Privacy Statement before beginning the survey – this does not commit you to starting or completing the survey:

I'm interested [hyperlinked to appropriate survey via custom URL]

Or copy and paste the URL below into your preferred internet browser:
[Direct link to appropriate SurveyMonkey survey]

Otherwise, you can disregard this invitation. If you have questions, you may contact the researcher via email at [Walden University-issued email address]. If you want to talk privately about your rights as a participant, you can call the Research Participant Advocate at Walden University at 612-312-1210. Walden University's approval number for this study is 08-23-19-0613926 and it expires on August 20, 2020.