


## Writing Timely Warning Notices & Analyzing Your TWN Policies



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## University of Montana FPRD



*Inadequate and conflicting policies for the issuance of timely warning were included in the 2009 and 2010 ASRs. A timely warning policy must provide a clear statement about the procedures the institution will follow to create and transmit timely warning notices (UM FPRD, 2017, p. 18).*

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## What Does the Handbook Say?



We suggest that your policy include the following:

- Circumstances for which a warning will be issued;
- Identity of the individual(s) or office(s) responsible for issuing the warning; and
- Manner in which the warning will be disseminated.

(2016 Handbook, p. 7-3).

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### What You Really Need to Say (1)...



Policies for making timely warning reports to members of the campus community regarding the occurrence of crimes listed in the Clery Act.

34 CFR § 668.46(i)

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### What You Really Need to Say (2)...



The circumstances for which a warning will be issued.

(2016 Handbook, p. 7-3)

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### What You Really Need to Say (3)...



The individual or office responsible for issuing the warning (who writes it or develops content).

(2016 Handbook, p. 7-3)

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### What You Really Need to Say (4)...



The individual or office responsible for issuing the warning (who initiates it or sends it).

(2016 Handbook, p. 7-3)

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### What You Really Need to Say (5)...



The manner in which the warning will be disseminated.

(2016 Handbook, p. 7-3)

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### What You Really Need to Say (6)...



A statement that such reports shall be provided to students and employees in a manner that is timely, that withholds the names of victims as confidential, and that will aid in the prevention of similar occurrences.

34 CFR § 668.46(i)(e)(1)

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### What You Really Need to Say (7)...



A statement that the institution is not required to issue a Timely Warning with respect to crimes reported to a pastoral or professional counselor.

University of St. Thomas FPRD (2017) &  
34 CFR § 668.46(i)(e)(2)

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### TWN Policies/Procedures



In the next session, we will focus on the policies/procedures that sit behind the policy statements made in the ASR...

Problems Include:

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### Policy Problems



- Failure to have an institutional policy/SOP that sits behind Annual Security Report disclosures
- Failure to adhere to the institutional policy/SOP that operationalizes how the TWN process works
- Inconsistencies between the ASR disclosures and the operational policy/procedure
- Overreliance on a single person (failure to designate and empower decision-makers)
  - For example, only the Chief can make a decision per policy but the Chief is inaccessible at the time of a reported crime

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## Handbook Guidance



- You must include pertinent information about the crime that triggered the warning. Your ***institution's policy*** regarding timely warnings should specify what types of information will be included (2016, p. 6-15).

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