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March 24, 2009

Dr. Benjamin J. Allen  
President  
University of Northern Iowa  
1227 W. 27<sup>th</sup> St.  
Cedar Falls, IA 50614

**OPE ID: 00189000**

Dear President Allen:

This letter constitutes our written request to the officials of the University of Northern Iowa for access, beginning April 21, 2009, to the HEA records, staff and students of the University of Northern Iowa (the University; UNI), Cedar Falls, IA, so that Mr. Clifton Knight and Ms. Linda Shewack can conduct a program review at UNI. This program review will evaluate UNI's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). UNI was selected from a sample of institutions of higher education with sworn police departments for a review as part of our on-going efforts to ensure compliance with the Clery Act. This review is not the result of any specific complaint or allegation of non-compliance.

We have scheduled this program review to coincide with the Quality Assurance Review (QAR) that the Federal Bureau of Investigation's Criminal Justice Information Service (CJIS) Audit Unit will be conducting at UNI. The U.S. Department of Education (ED) is partnering with the CJIS Audit Unit to ensure accurate crime reporting on America's college campuses. The regulatory authorities for this visit are cited below.

34 CFR Section 668.24(d)(2) "An institution shall make its records readily available for review by the Secretary or the Secretary's authorized representative at an institutional location designated by the Secretary or the Secretary's authorized representatives."

34 CFR Section 668.24(f)(1) "An institution that participates in any Title IV, HEA program and the institution's third party servicer, if any, shall cooperate with an independent auditor, the Secretary, the Department of Education's Inspector General, the Comptroller General of the United States, or their authorized representatives, a guaranty agency in whose program the institution

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participates, and the institution's accrediting agency, in the conduct of audits, investigations, program reviews, or other reviews authorized by law."

34 CFR Section 668.24 (f)(2) "The institution and servicer must cooperate by -  
(ii) Providing reasonable access to personnel associated with the institution's or servicer's administration of the Title IV, HEA programs for the purpose of obtaining relevant information."

Failure to provide access to the program review team will result in the U.S. Department of Education initiating an administrative action against the institution. An administrative action may include, but is not limited to: the imposition of a formal fine and/or the limitation, suspension or termination of the institution's Title IV program participation, pursuant to 34 CFR Part 668, Subpart G.

The program review team will arrive at the UNI Police Department at approximately 8:00 a.m. Tuesday, April 21, 2009. At that time, the program review team will discuss the program review process with UNI Police officials and will conduct a preliminary examination of the materials as requested below. After this initial briefing, we will conduct an entrance interview with representatives from all offices with responsibilities for any aspect of UNI's campus security and student disciplinary programs. Representatives from other offices are also welcome to attend and participate. We ask that you or your designee determine who should be in attendance and notify those officials accordingly. Please also arrange for an appropriate meeting space for the entrance conference.

The review will focus initially on UNI's Clery Act compliance during calendar year 2007 but may be expanded if necessary. We respectfully request that the University make every effort to provide the review team with immediate access to all requested records and information sources. We will need unrestricted access to unredacted originals of incident reports generated by UNI's Police Department and other offices involved in security-related functions such as Judicial Affairs, Residence Life, and Student Affairs. Please be advised that we will endeavor to protect the confidentiality and privacy rights of all individuals identified in records that are provided to ED officials.

Our access to employees and students for the purposes of conducting interviews is an essential part of the review process. As such, we request your assistance to help ensure that employees and students make themselves available in as timely a manner as possible.

At the conclusion of the review, the review team may meet with institutional officials to discuss any preliminary findings, recommendations, and next steps. Follow-up telephone conferences may be necessary as well. UNI will receive an official written report at a later date.

In preparation for the review, please provide the following information within 15 days of receipt of this letter:

1. A listing of all Campus Security Authorities for Clery Act purposes (positions and offices are sufficient);
2. A copy of the catalog and student handbook for the University and for each separate College, school, division or location within UNI for academic years 2006-2007 and 2007-2008;
3. A listing of all incidents of crime reported to the UNI Police Department or other campus security authority in calendar year 2007;
4. A copy of the organizational chart for the policing and security-related functions for the University and for all Colleges, schools, etc. within UNI;
5. A complete set of the UNI Police Department's Standard Operation Procedures regarding the following functions (dispatch, response to calls, report writing, arrests including issuance of citations, and protocols for arson, sexual assault, and active shooter scenarios);
6. University data showing the percentage of current students enrolled receiving Title IV, Federal Student Aid program funds;
7. A complete set of all applications, brochures, disclosures, forms, and other publications normally distributed to 1) prospective students; 2) prospective employees; 3) first-time students; and, 4) new hires of the University and all Colleges, schools, etc. within UNI;
8. Copies of all agreements and/or contracts with any agencies or organizations that provide any protective service, security, counseling, or other service related to the University's policing, security and safety programs;
9. A detailed description of all dispatch/response and recordkeeping systems (hardcopy; software; etc.) utilized by any University office or contractor with security-related responsibilities (UNI Police, Judicial Affairs, Residence Life, Student Life; etc.);
10. Copies of all campus, patrol, and/or sector maps (with legends) utilized by the UNI Police, contract security agency, and/or the University's real estate office;
11. A comprehensive listing of all buildings and land owned or controlled by the University including leased property;
12. A listing of all buildings and land owned by any University-recognized student organizations including leased property; and,
13. Copies of the two most recent Campus Security Reports prepared and distributed by UNI for purposes of complying with the Clery Act.

All Personally Identifiable Information (PII) must be safeguarded. We have enclosed instructions for submitting data and/documents containing PII. We also request that you not redacted any of the data on the copies submitted. This information must be sent to:

ATTN:Linda Shewack  
U.S. Department of Education  
Federal Student Aid/PC/SEC  
830 First Street, NE - UCP3, Room 74B1  
Washington, DC 20002

The following additional materials must be available for our review upon our arrival at the UNI Police Department on April 21, 2009:

1. A listing of all UNI officials (name & position) scheduled to participate in the program review entrance conference;
2. An "audit trail" of all incidents of crimes (organized by category of crime and incident report number) reported to the UNI Police Department or other campus security authority that were included in the statistical disclosures contained in UNI's Campus Security Reports for calendar year 2007;
3. A listing of all arrests and disciplinary referrals for violations of laws or institutional policies involving alcohol, illegal drugs, illegal usage of legal controlled substances, and weapons during calendar year 2007;
4. An "audit trail" of all arrests and disciplinary referrals that were included in the Campus Security Reports for violations of laws or institutional policy involving alcohol, illegal drugs, illegal usage of legal controlled substances, and weapons during calendar year 2007;
5. A listing of all timely warnings issued by UNI during calendar year 2007 and a description of the means or media used to disseminate the warning;
6. A copy of UNI's daily crime log for calendar year 2007 (hardcopy or electronic);

Access to additional records and information will be requested as needed. Subsequent requests may cover time periods other than those specified above.

If you have any questions, please call Ms. Linda Shewack at 202-377-4071.

Sincerely,

  
M. Geneva Leon, Director  
School Participation Teams-NE

Enclosure

cc: Mr. David Zarifis, Director of Public Safety, UNI  
Ms. Joyce Morrow, Director of Financial Aid, UNI

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip and are encrypted with AES encryption.

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.