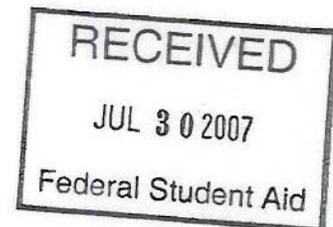




EASTERN MICHIGAN UNIVERSITY

July 27, 2007



Mitch Cary
Institutional Review Specialist
Federal Student Aid, School Participation Team – Denver
U. S. Department of Education
1391 N. Speer Boulevard, Suite 800
Denver, CO 80204

Mr. Cary:

On behalf of Eastern Michigan University (EMU), I want to thank the Department of Education (DOE) for conducting a thorough review of EMU's campus security operations and its compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Statistics Act (Clery Act).

EMU accepts the findings of the DOE's Program Review Report, dated June 29, 2007 (as clarified by your July 4, 2007 letter to Dr. John Fallon, III), and EMU's Board of Regents and administration accept responsibility for completing each "Required Action" and bringing EMU into full compliance with the Clery Act.

As you read the response, you will see that EMU has incorporated the Required Actions from each finding in the DOE's Report into a comprehensive Clery Act compliance plan. The highlights include:

- The introduction of a full range of new policies and procedures to ensure EMU is following best practices in regard to campus safety and security issues;
- Implementing a new "timely warning" system that will alert the EMU campus community of any potentially serious threats so students, faculty and staff have the opportunity to take necessary precautions to ensure their safety;
- Adopting a process that allows appeals of EMU Department of Public Safety decisions not to issue "timely warnings" and requires a formal review of certain EMU Public Safety Department decisions not to issue a "timely warning;"

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- Arranging to bring to campus a nationally recognized Clery Act training firm, Security on Campus, Inc., to conduct extensive training sessions for approximately 50 members of the EMU community;
- Completing a statistical independent validation process which utilized an independent audit firm to confirm the accuracy of EMU's crime statistics reported over the last three years;
- A new process to coordinate with the Ypsilanti Police Department to obtain and include pertinent crime statistics in EMU Department of Public Safety's Safety Awareness Handbook; and
- Crime log process revisions that will result in more accurate and timely recording of incidents and dispositions;

EMU is fully committed to changing the manner in which it operates in regard to campus safety issues. This is demonstrated in the attached response, recent personnel and organizational changes, and the sixteen safety and security strategies that were recently adopted. The safety and security strategies, some of which have been implemented and others that are being implemented, include:

- Assigning oversight responsibility for the Department of Public Safety (DPS) to the vice president for business and finance, a reporting relationship more closely aligned with best practice in higher education;
- Completing a full, formal and systematic safety and security audit of the University's main campus;
- Providing bi-weekly campus incident report summaries to students, faculty and staff;
- Accelerating the review, revision and dissemination of the University's Emergency Response Plan by the University's Emergency Response Team;
- Conducting campus and security forums each semester for the purposes of providing avenues of expression for students, faculty, staff and others, and exploring new approaches to campus safety;
- Establishing a formal personnel training capacity within the University's Office of Human Resources to address the full range of institutional compliance needs and responsibilities.

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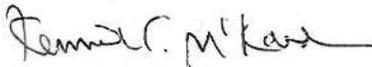
- Taking planned action to improve the University's communications and media relations systems;
- Initiating efforts to address the University's culture towards valuing and enabling honesty, transparency, civility, collaboration and trust; and
- Engaging local police agencies in collaborative efforts to improve safety and security on and adjacent to campus.

EMU, its Board of Regents and administration, are confident that these efforts will make the EMU campus and community a safer and more secure learning environment for our students, faculty and staff.

In closing, let me express EMU's sincere hope that our determined effort to achieve and maintain compliance, along with our cooperation with the U. S. Department of Education, will be favorably received and considered by you in the next stages of this process. As noted above and in our response, we have striven to devise the new policies and procedures so that they not only meet but exceed the requirements of the Clery Act Compliance (e.g. timely warning appeal process).

If you have any questions or concerns regarding any aspect of EMU's response or the attached materials, please do not hesitate to contact me.

Sincerely,



Kenneth A. McKanders
General Counsel

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Response to Finding #1

Please find enclosed documentation regarding Finding Number One's "Required Actions". These documents include a new "Timely Warning Procedure", a new "Timely Warning Process Flowchart", and a new "Timely Warning Policy".

Also, please find enclosed copies of communications sent by EMU's Department of Public Safety to law enforcement agencies whose jurisdictions include EMU's main campus, off-campus locations, or areas adjacent thereto. These communications request that EMU be included in the addressee's crime alert dissemination list, which would allow EMU the opportunity to issue a timely warning if necessary.

Furthermore, Eastern Michigan University is providing an assurance to the U.S. Department of Education that it will comply with the "timely warning" requirement and all other provisions required by the Clery Act.

Response to Finding #2

Please find enclosed documentation regarding Finding Number Two's "Required Actions". These documents include EMU's comprehensive plan developed to achieve full compliance with all requirements of the Clery Act. This plan includes formal Clery Act compliance training conducted by nationally recognized Clery Act experts (Security on Campus, Inc.) for listed EMU personnel. A detailed description of this training is provided in the enclosed documentation. Furthermore, the compliance plan also includes an evaluative component to confirm compliance with all Clery Act requirements upon plan completion and annually thereafter.

Finally, please find enclosed a summary of steps taken by EMU to ensure safety on campus as a result of the theft of its master keys in August of 2005.

Response to Finding #3

Please find enclosed documentation regarding Finding Number Three's "Required Actions". These documents include a new "Timely Warning Policy" that is inserted in EMU's "Safety Awareness Handbook". Also, please find enclosed a new "Timely Warning Procedure" and a new "Timely Warning Process Flowchart".

Finally, please find enclosed copies of communications sent by EMU's Department of Public Safety to law enforcement agencies whose jurisdictions include EMU's main campus, off-campus locations, or areas adjacent thereto. These communications request that EMU be included in the addressee's crime alert dissemination list, which would allow EMU the opportunity to issue a timely warning if necessary.

Response to Finding #4

Please find enclosed documentation regarding Finding Number Four's "Required Actions".

This documentation includes:

- Updated and validated crime statistics for years 2004, 2005 and 2006
- Clery Crime Statistics Reporting procedure
- Counting Referrals for Disciplinary Actions from Student Judicial Services Procedure
- Student Conduct Data Reporting from University Housing Department Procedure
- EMU's Clery Act Compliance Implementation Plan, including specific actions regarding training of EMU staff that have Clery Act crime reporting responsibilities
- Engagement letter from The Rehmann Group regarding crime statistics validation project
- The Rehmann Group's Crime Statistics Validation Audit Report

Response to Finding #5

Please find enclosed documentation regarding Finding Number Five's "Required Actions". Enclosed is EMU's revised "Safety Awareness Handbook", which contains all required policies and provisions specified in the Department of Education's Clery Act regulations.

Also, please note, EMU's Department of Public Safety has abolished its dual crime statistical reporting system. The new single reporter process is described in EMU DPS' new Clery Crime Statistic Reporting procedure.

Response to Finding #6

Please find enclosed documentation regarding Finding Number Six's "Required Actions". Enclosed are EMU's accurate crime statistics from years 2004, 2005, and 2006.

Finally, please find enclosed documentation of EMU's good faith effort to obtain crime statistic data from law enforcement agencies whose jurisdictions include EMU's main campus, off-campus locations, or areas adjacent thereto. All crime statistic data that EMU was able to obtain from these outside law enforcement agencies are reflected in the crime statistics submitted.

Maps indicating the location of EMU's off-campus facilities and a map detailing jurisdictions of law enforcement agencies adjacent to main campus are also enclosed.

Response to Finding #7

Please find enclosed documentation regarding Finding Number Seven's "Required Actions".

This documentation includes The Rehmann Group's Crime Statistics Validation Audit Report and EMU's new "Crime Log Procedures".