



Complying with the Stop Campus Hazing Act

April 25, 2025

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Disclaimers

- We are not giving you legal advice.
- Consult with legal counsel regarding specific situations.

- Background on the Stop Campus Hazing Act
- Timeline
- Requirements
 - *NEW*: Campus Hazing Transparency Report
 - Include hazing reports in Annual Security Report (ASR)
 - Policy and Prevention
- Best Practices for Addressing Reports of Hazing

- **Public Law No: 118-173**
- It amends the Clery Act
- Introduced in the House on September 21, 2023
- Signed into law on December 23, 2024

Theme: Transparency

- *NEW*: Campus Hazing Transparency Report
- Include hazing reports in ASR

Timeline

- January 1, 2025
 - Institutions were required to begin compiling hazing data for inclusion in the 2026 [ASR](#).
- June 23, 2025
 - Hazing policies must be implemented.
- July 1, 2025
 - Institutions must begin collecting data for the [Campus Hazing Transparency Report](#).
- December 23, 2025
 - The [Campus Hazing Transparency Report](#) must be publicly available on the institution's website.
- October 1, 2026
 - [ASR](#) will include hazing statistics.



Campus Hazing Transparency Report (CHTR)

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Collecting Data for the CHTR

- Institutions must begin collecting data on **July 1, 2025 (20 U.S.C. 1092(f))**
- The reports must document:
 - each incident involving a student organization where a hazing violation was **found**, including the name of the student organization,
 - NOTE: "Student organization" only applies to student orgs that are "established or recognized by the institution." You do not have to use the Clery definition.
 - NOTE: "Hazing" is defined as the institution's standards of conduct. You do not have to use the Clery definition.
 - a description of the finding (noting whether it involved alcohol or drugs),
 - the institution's conclusions and the sanctions imposed, and
 - the date the incident occurred, the date the investigation began, the date of the responsibility finding, and the date the institution notified the student organization of the finding.

What else must be in the CHTR?

**New: Campus Hazing
Transparency Report**

- A statement notifying the public of the annual availability of statistics on hazing in the ASR, including a link to such report
- Information about the institution's policies relating to hazing and applicable local, State, and Tribal laws on hazing
- The information included in each update required, which shall be maintained for a period of 5 calendar years from the date of publication of such update.

What else may be included?

**New: Campus Hazing
Transparency Report**

- Information that is included as part of a report published by the institution and meets the requirements of the CHTR
- Any additional information determined by the institution to be necessary or reported as required by state law
- A description of the purposes of and differences between the ASR reports and CHTR

Compliance Notes

New: Campus Hazing Transparency Report

- Remember that the reporting cycles are *different* than ASR
- Required data collection begins **July 1, 2025**
- Initial report must be posted to public website by **December 23, 2025**
 - It must be updated at least 2 times each year
- Carve out for institutional definition of [student orgs](#) and [hazing](#)
 - “... summarizing findings concerning any student organization (except that this shall only apply to student organizations that are established or recognized by the institution)...
 - Actual violations only
- No personally identifiable information

CHTR & Collin's Law (Ohio)

- Collin's Law Reports
 - Name of the subject (remember, no PII)
 - Date of when the subject of the investigation was charged with a violation
 - Description, investigation & findings, penalties
 - Date the matter was resolved
 - Aug. 1 and Jan.1 of each year
- CHTR
 - Each incident involving a student organization where a hazing violation was found, including the name of the student organization,
 - a description of the finding (noting whether it involved alcohol or drugs),
 - Conclusions and sanctions
 - Dates(when the incident occurred, the date the investigation began, the date of the responsibility finding, and the date the institution notified the student organization of the finding
 - Dec. 23, 2025 and then "not less frequently than 2 times per year“
- **Think about it:** Will your numbers be the same? (Work with legal counsel)



Annual Security (Clery) Reports

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Definitions

**Include hazing
reports in ASR**

- For purposes of reporting for your ASR
 - Hazing
 - Student Organizations

Hazing Definition (1 of 2)

**Include hazing
reports in ASR**

- Any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that
 - is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and
 - causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including

Hazing Definition (2 of 2)

**Include hazing
reports in ASR**

- whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
- causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
- causing, coercing, or otherwise inducing another person to perform sexual acts;
- any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
- any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.”

Already have a definition of hazing?

**Include hazing
reports in ASR**

- Remember the purpose of the new definition – ASR reporting
- Remember the purpose of your current definition
- Do you want to adopt the new federal definition for purposes of student/organizational conduct?
 - Does it fit your institutional ethic of care?
 - Is it required by state or local law?
 - Does it impact the consistency of your sanctions?
 - Note the Act's definition of Student Organization

Student Organization Definition

**Include hazing
reports in ASR**

“An organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.”

Already have a definition of student organization?

Include hazing reports in ASR

- The Act's definition includes groups not formally recognized by the institution
 - "... an organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution." [Emphasis added].
- Does that definition make sense for your student conduct process?
 - Jurisdiction under existing Policy
 - Ability to Sanction
- Consider impact to internal recognition policies

Hazing & ASR

Include hazing
reports in ASR

Institutions were required to begin compiling hazing data beginning **January 1, 2025**, for inclusion in the 2026 Annual Security Report (published by October 1st every year)



Notes on ASR Crime Statistics

Include hazing
reports in ASR

- An institution must report to the Department and disclose in its ASR statistics for the three most recent calendar years concerning Clery crimes (now including **hazing**):
 - That occurred on or within its Clery geography **and**
 - That are reported to local police agencies or to a campus security authority

Notes on ASR Crime Statistics (cont.)

**Include hazing
reports in ASR**

- Must be recorded by location
- Cannot remove from statistics based on a decision by court, jury, etc.
- Must be recorded by calendar year (not academic year)
- Hate crimes must be recorded by category of bias
- Must make reasonable, good faith effort to obtain statistics, may rely on the information supplied by a local or State police agency

ASR: Crime Statistics (1 of 2)

New for 2026 ASR: Hazing

**Include hazing
reports in ASR**

- Primary Crimes
 - Murder/Non-Negligent Manslaughter
 - Negligent Manslaughter
 - Rape
 - Fondling
 - Incest
 - Statutory Rape
 - Robbery
 - Aggravated assault
 - Burglary
 - Motor vehicle theft
 - Arson

ASR: Crime Statistics (2 of 2)

New for 2026 ASR: Hazing

Include hazing reports in ASR

- Arrests and referrals for disciplinary actions for:
 - Liquor law violations
 - Drug law violations
 - Illegal weapons possessions
- Hate Crimes: All primary crimes PLUS
 - Larceny-theft
 - Simple Assault
 - Intimidation
 - Destruction/damage/vandalism of property
- VAWA Offenses
 - Domestic Violence
 - Dating violence
 - Stalking

ASR: Crime Statistics and Multiple Offenses

Include hazing reports in ASR

- The NIBRS allows law enforcement to report up to **10 co-occurring offenses per single incident.**
- *Used to be the FBI's SRS Hierarchy Rule (but was retired)*

Clery Geography (1 of 2)

Include hazing reports in ASR

- Campus
 - Any building or property owned or controlled by the institution
 - Any building or property that is:
 - Within or reasonably contiguous to the area identified as your “campus”
 - Owned by the institution but controlled by another person
 - Is frequently used by students, and
 - Supports the institution’s purposes
 - Residence Halls
 - Dormitories or other residential facilities for students on campus

Clery Geography (2 of 2)

Include hazing reports in ASR

- Non-campus
 - Any building or property owned or controlled by a student organization officially recognized by the institution; or
 - Any building or property
 - owned or controlled by an institution (i.e., leased)
 - that is used in direct support of, or in relation to, the institution's educational purposes,
 - is frequently used by students, and
 - is not within the same reasonably contiguous geographic area of the institution.
- Public Property
 - Must satisfy all three:
 - (1) public (e.g., publicly-owned);
 - (2) within or adjacent to campus; and
 - (3) accessible from campus

What about these locations?

Include hazing reports in ASR

- Overnight trip by a sports team for an away game
- Semi-formal trip by a fraternity to the mountains
- Hotels and spaces rented during a study abroad semester
- Extension locations



- A campus police department or a campus security department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department under paragraph (i) of this definition, such as an individual who is responsible for monitoring entrance into institutional property.
- Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings. If such an official is a pastoral or professional counselor as defined below, the official is not considered a campus security authority when acting as a pastoral or professional counselor.

- Your ASR must include hazing policies and a prevention programming information
 - These should be in place by June 23, 2025
- The Act specifies that your policy can define “Hazing” for your institution
- Your Policy must include :
 - How to report incidents (as defined by the institution)
 - The Process used to investigate
 - Information of local, State, and Tribal laws on hazing

Policy and Prevention (cont.)

- Statement of Policy regarding prevention and awareness programming,
 - Must be:
 - Research-informed
 - Campus-wide
 - Designed to reach students, staff and faculty
 - “Primary prevention strategies intended to stop hazing before hazing occurs”
 - May include:
 - Skill building for bystander intervention
 - Information about ethical leadership
 - Promotion of strategies for building group cohesion without hazing



Best Practices for Addressing Reports of Hazing

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Best Practices for Addressing Reports of Hazing

- Be prepared
- Be quick
- Be transparent
- Be flexible
- Be Cooperative

Common hazing practices include alcohol consumption, humiliation, sex acts

How might hazing intersect with other policies and concerns for your campus?

- Hazing
 - Title IX Policy
 - Student Organization Misconduct
 - State laws regarding hazing
 - Underage Drinking
 - Civil Rights Policy

Regulatory Return to 2020 Regs



- February 4, 2025 Dear Colleague Letter
 - Supersedes Jan. 31 Guidance
- OCR will enforce the 2020 Title IX Regulations – NOT the 2024 regs
 - Definition of Sexual Harassment
 - Procedural protections
 - "... no portion of the 2024 Title IX Rule is now in effect in any jurisdiction."

A Note about Title IX Retaliation

- Definition from the 2020 Title IX Regulations:
 - No recipient [i.e., college or university subject to Title IX] or other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX... Intimidation, threats, coercion, or discrimination, ***including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment,*** for the purpose of interfering with any right or privilege secured by title IX or this part, constitutes retaliation.

34 CFR 106.71(a)(emphasis added).

Looking for Common Ground (1 of 2)

- Student Organization Conduct Process
 - Investigation Required
 - Notice requirement
 - Directive to refrain from phone usage
 - Participation required
 - Group Interviews
 - Anonymity allowed
- Commons Ground
 - Investigation by a trained TIX investigator
 - Right to an advisor
 - TIX-Compliant Notice to the Parties
 - Group interviews?
 - Limit communication as necessary to gather information in a group setting
 - Hearing with cross-examination

For Illustrative purposes only. Not intended to depict all of the procedural requirements under Title IX

Looking for Common Ground (2 of 2)

- Title IX Process
 - Investigation required by a specially trained investigator
 - Right to an advisor
 - Notice that identifies conduct and potential policy violation
 - Participation is voluntary
 - No prohibition on speaking with others about the case
 - Hearing with cross-examination
 - Anonymity not allowed

For Illustrative purposes only. Not intended to depict all of the procedural requirements under Title IX

To Do Items

- Begin collecting data for Clery reporting.
 - Work with your campus Clery Coordinator, CSAs, and student affairs staff to understand the nuances of the definition of Hazing, how to properly count incidents, and which groups constitute “student organizations” under the Act.
- Work with campus stakeholders and legal counsel to ensure compliance with the Act’s requirement that hazing policies be implemented by June 23, 2024.
 - If you live in a state that has its own hazing law, work to reconcile any competing legal obligations.

To Do Items (cont.)

- Evaluate your current policy statements and guidance to your community about how to report incidents of hazing and the process used to investigate these incidents.
- Reconsider your options for providing prevention programming to your community.
 - Are your current trainings research-informed? Campus-wide? Designed to reach students, staff, and faculty?
 - Remember that these prevention efforts may address topics like skill-building for bystander intervention, information about ethical leadership, and the promotion of strategies for building group cohesion without hazing.

**Check out our
website and
follow us on
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