

Student Emergency Contact & Missing Person Notification Policy

1. Purpose and Scope

This policy establishes Clark University's requirements for the collection, maintenance, and use of student emergency contact information. It defines the circumstances under which the University may notify a student's designated contact and sets out Clark's procedures for missing student notification in compliance with the Higher Education Opportunity Act of 2008 (HEOA), 20 U.S.C. § 1092(j).

This policy applies to all enrolled Clark University students, whether residing on or off campus.

2. Definitions

Emergency Contact. A person designated by the student to be notified in the event of a medical emergency, safety concern, death, or other circumstance in which the University determines that notification is necessary to protect the health or safety of the student or others.

Confidential Missing-Person Contact. A person designated by the student, under HEOA, to be notified if the student is determined to be missing. A student may name the same individual as both the Emergency Contact and the Confidential Missing-Person Contact, or may designate different individuals for each role.

Custodial Parent or Legal Guardian. For a student under 18 years of age who is not legally emancipated, the parent or guardian who holds legal custody, regardless of whom the student has designated as an Emergency Contact or Confidential Missing-Person Contact.

Missing Student. A student whose whereabouts cannot be ascertained by the University and whose absence is inconsistent with the student's usual pattern of behavior or whose circumstances suggest a risk to the student's safety, as determined by the Clark University Police Department in consultation with the Dean of Students.

3. Student Requirements

3.1 Initial Designation

All enrolled students must provide at least one Emergency Contact (name, relationship, and current telephone number) through the ClarkYOU student portal. Students are strongly encouraged to provide a second Emergency Contact and to separately designate a Confidential Missing-Person Contact.

Students under the age of 18 who are not legally emancipated must designate at least one custodial parent or legal guardian as an Emergency Contact.

3.2 Deadline and Registration Hold

Students who have not provided at least one Emergency Contact by October 1 of their first semester of enrollment will have a registration hold placed on their account by the Dean of Students Office. The hold will be removed once the required information has been submitted.

3.3 Annual Reconfirmation

At the start of each academic year, students will be prompted to review and confirm their Emergency Contact and Confidential Missing-Person Contact information in ClarkYOU. Students who are missing this information as of October 1 of each year will have a registration hold placed on their account for the following term until the information has been confirmed.

Students are responsible for maintaining accurate and current contact information at all times, including between annual reconfirmation periods.

3.4 Notifying Designated Contacts

Students are expected to inform the individuals they have designated that they have been listed, and to discuss with them the types of information that may be shared in an emergency.

4. Circumstances for Notification

Decisions to notify a student's Emergency Contact will be made by the Dean of Students or, outside of normal business hours, the Dean of Students on call, in consultation with Clark University Police, Health Services, the Center for Counseling and Personal Growth, and other University officials as appropriate.

The University may contact a student's Emergency Contact in circumstances including, but not limited to, the following:

- A significant physical health concern, mental health concern, medical emergency, including hospitalization due to injury, illness, or other circumstance presenting substantial risk to the student's well-being;
- A report that the student is missing or a credible concern for the student's safety or whereabouts;
- The student's death or a life-threatening situation;
- Other health or safety emergencies in which notification is necessary to protect the student or others.

If the primary Emergency Contact cannot be reached, the University may attempt to reach a secondary Emergency Contact (if one has been provided), the Confidential Missing-Person Contact, or, where required by law, a custodial parent or legal guardian.

5. Missing Student Notification (HEOA Compliance)

Consistent with the Higher Education Opportunity Act of 2008, Clark University has adopted the following procedures for students who are determined to be missing. These procedures apply to all enrolled students, including students residing in on-campus housing, off-campus housing, and students participating in Clark-sponsored programs away from the Worcester campus.

5.1 Reporting a Missing Student

Any member of the Clark community who has reason to believe that a student may be missing should immediately notify the Clark University Police Department at 508-793-7575. Reports may also be made to the Dean of Students Office or, for residential students, to Residential Life and Housing staff, who will refer the report to University Police without delay.

5.2 Investigation

Upon receiving a report, University Police will initiate an investigation in coordination with the Dean of Students and, for residential students, Residential Life and Housing. The investigation will include reasonable efforts to contact the student directly and through known associates; review of University-held records, including but not limited to card access data and network and system login activity; and any other steps appropriate under the circumstances. All such reviews will be conducted in accordance with applicable privacy laws and University policies governing access to student information. For students residing off-campus or participating in programs away from Worcester, available information may be more limited, and the University will rely on coordination with local contacts, known associates, and law enforcement as appropriate.

A student will be determined to be missing when University Police, in consultation with the Dean of Students, conclude that the criteria in Section 2 (Definitions) are met.

5.3 Notification Timeline

University Police will enter a missing student under 21 into the National Crime Information Center database and will open an investigation immediately upon determining that a student is missing.

In addition, if the missing student is under 18 years of age and not emancipated, the University will contact a custodial parent or legal guardian immediately upon the determination that the student is missing, regardless of whom the student designated as an Emergency Contact or Confidential Missing-Person Contact.

No later than 24 hours after a student is determined to be missing, Clark University will:

1. Notify the student's Confidential Missing-Person Contact, if one has been designated;
2. Notify the student's Emergency Contact(s) if no Confidential Missing-Person Contact has been designated, or in addition to the Confidential Missing-Person Contact when appropriate; and
3. Notify the local law enforcement agency with jurisdiction, unless that agency was the source of the original report.

6. Confidentiality and Privacy

Emergency Contact and Confidential Missing-Person Contact information are part of a student's education records and are protected by the Family Educational Rights and Privacy Act (FERPA),

20 U.S.C. § 1232g. Access to this information within the University is limited to officials with a legitimate educational interest.

Under FERPA's health-or-safety emergency exception (34 C.F.R. § 99.36), the University may disclose information from a student's education records, without prior written consent, to appropriate parties when knowledge of the information is necessary to protect the health or safety of the student or others. Notifications made under this policy are conducted in accordance with that exception. The University retains discretion to determine whether a health-or-safety emergency exists and what information, if any, should be disclosed.

Confidential Missing-Person Contact information is accessible only to authorized University officials and to law enforcement in furtherance of a missing-person investigation, and will not be disclosed for any other purpose.

7. Updating Contact Information

1. Log in to ClarkYOU with Clark credentials.
2. Open the ClarkALERTS Updater box on the right side of the home page and click "Update your emergency contacts."
3. Within CUWeb, select the "Personal Information" tab, then "Update Emergency Contacts."
4. Select the contact role (Emergency Contact, Secondary Emergency Contact, or Confidential Missing-Person Contact), enter the contact's information, and save.

8. Relationship to ClarkALERTS

This policy governs notifications made by the University to a designated contact on a student's behalf. It is distinct from ClarkALERTS, the University's mass emergency notification system, which delivers time-sensitive safety messages directly to enrolled students, faculty, and staff. Updating Emergency Contact information does not change a student's ClarkALERTS settings, and updating ClarkALERTS preferences does not update Emergency Contact information.

9. Responsible Office and Questions

This policy is administered by the Dean of Students Office. Questions may be directed to:

- Dean of Students—1-508-793-7423 dos@clarku.edu
- Clark University Police — 508-793-7575 (for missing-person reports)
- Registrar's Office — (508)793-7426 or registrar@clarku.edu (for FERPA-related questions)

10. Policy Review

This policy will be reviewed at least every three years by the Dean of Students Office, in consultation with the Office of the General Counsel and the Clark University Police Department. Interim revisions may be made as needed to maintain legal compliance or to reflect changes in University practice.

History/Revision Information

Effective Date: August 10, 2026

Last Amended Date: August 10, 2026

Next Review Date: June 1, 2027