

Dawn Career Institute

Annual Campus Safety and Security Report

Statistical Data Period

Covered: 2023 – 2025

Distributed: September 29, 2026

Notice of Availability of Annual Safety and Security Report

A copy of the Dawn Career Institute Campus Safety and Security Report is posted to its website on an annual basis to all current students and employees as part of the school commitment to safety and security pursuant to the requirements of the *Federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)* and the *Higher Education Opportunity Act (HEOA)*. The report includes statistics for the previous three years concerning reportable crimes that occurred on the campus and on public property immediately adjacent to and accessible from the campus. The report also includes official institutional policies concerning campus security matters as well as information on Title IX. A paper copy of the report can be requested by visiting the Office of the Registrar. Students and employees can view the entire report located on the school website Consumer Information section at:

<http://www.dawncareerinstitute.edu/Consumer-Information.php>

Additionally, we would like to remind all students and staff of the Title IX, FERPA, and Drug and Alcohol policies that are also available in the Consumer Information section of the school website.

**Thank you,
DCI Management**

Additional information regarding Title IX is included in this report:

- Title IX Coordinator
- Prohibited Conduct under Title IX
- Reporting & Confidentially Disclosing Sexual Violence – Know Your Options
- Interim and Supportive Measures to Protect Students Under Title IX

Annual Report: Campus Safety and Security Policies and Procedures

Dawn Career Institute ("School") is providing the following information to all of its employees and students as part of the School commitment to safety and security pursuant to the requirements of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. If you should have questions about any of the information provided in this Report, please contact the Campus President, Shaun Carney, by phone/email at: 302-273-3560, scarney@dawncareerinstitute.edu.

Policy Statements:

Disclosing What We Do and How We Do It

POLICIES FOR PREPARING THE ANNUAL DISCLOSURE OF CRIMINAL STATISTICS

All incidents are reported and documented on the Incident Report, which is sent to the Campus President. Reports are kept in a secure location in the Campus President's office. The annual crime report is prepared by gathering campus crime statistics and data from the local police department and other relevant information by the Campus President. All prospective students and employees may obtain copies of this report by request to the School Registrar's office.

Reporting Criminal Emergencies

Since the School facility does not include a campus police department, the Delaware State Police Department is the law enforcement agency charged with the official oversight responsibilities for our School. If a student witnesses or is involved in a crime in progress, that student should call "9-1-1" from the nearest available telephone as soon as possible and then notify the Campus President. Delaware State Police Officers will be responding to all "9-1-1" calls originating on the campus.

Campus crime, arrest and referral statistics include those reported to the Delaware State Police Department and designated campus authorities.

Campus Access Policy

During normal business hours (Monday-Friday, 9:00 am – 5:00pm, Saturday 9:00 am-1:00 pm), the School is open to students, employees, parents, contractors, guests and invitees. During non-business hours, including the time during evening classes, access is allowed to students, employees, security personnel and individuals with prior authorization. Students and employees are responsible for the conduct of their guests at all times.

The School does not have any officially recognized student organizations with off-campus locations and does not provide or operate off-campus housing facilities. All off-campus criminal

offenses should be reported to a local law enforcement agency as soon as possible.

Designated Campus Security Authorities

Dial 9-1-1 to report all emergencies. Call (302)273-3560 or visit one of the following Designated Campus Security Authorities (DCSA) to report all non-emergencies:

DCSA Offices	Ext.
Campus President – Shaun Carney	201
Director of Education – Scott Simpson	107
Director of Admissions – Dave Trimble	201
Title IX Coordinator – Shaun Carney	201

While students *may* report crimes to any campus staff member, the offices listed above are those to whom the School *would prefer* crimes to be reported.

The School community members, including students, faculty, staff and guests, are encouraged to report all crimes and public safety related incidents in an accurate and timely manner.

The School does not employ pastoral, psychological or crime victim counselors. DCI campus community members may obtain contact information for these public resources from any DCI DCSA.

Campus Law Enforcement

Please call 9-1-1 for ALL emergencies. The School does not operate a campus police department. Only the Delaware State Police or New Castle County Police Department and other federal, state and local police agencies have the jurisdiction to apprehend and arrest anyone involved in illegal acts on the campus. Designated Campus Security Authorities are in place for reporting purposes only.

The School recognizes that laws and rules are necessary for society to function and we support the enforcement of law by law enforcement agencies. All persons on the campus are subject to these laws at all times. The officers of law enforcement departments will communicate with School authorities when criminal incidents occur. The School authorities will cooperate with the local Police Department investigative staff when incidents arise that require resources, reports and information from the institute. There is no written memorandum of understanding between the School and the local Police Department.

Limited Confidential Reporting Procedures

The School encourages anyone who is the victim of, or witness to any crime to promptly report the incident to the Delaware State Police Department. Because police reports are public records under state law, the police department cannot hold reports of crime in confidence.

Security Awareness

Students are briefed during their orientation on the School's campus security procedures and policies by either the Director of Education or the Director of Admissions. Employees are briefed during their New Hire orientation.

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the security of others. We all need to be aware of our individual responsibility for our own security and the security of those around us. Students and employees are encouraged to use the "buddy system" for their own security as much as possible. To enhance personal safety, especially during/after evening class, walk with friends or someone from class that you know and trust.

Disclosures to Alleged Victims

The School will, upon written request, disclose to the alleged victim of a crime of violence or non-forcible sex offense, the results of any disciplinary hearing conducted by the institute against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime of offense, the School will provide the results of any disciplinary hearing to the victim's next of kin, if so requested in writing.

Alcoholic Beverages and Illegal Drugs

The School has been designated "ALCOHOL FREE" and "DRUG FREE". The School has a "zero" tolerance for the possession, consumption and/or sale of alcoholic beverages and/or any controlled substance deemed illegal under state and/or federal laws.

The use, possession, or distribution of prohibited substances (including alcoholic beverages, illegal chemical substances, or any legally prescribed chemical substances used in a manner contrary to a doctor's prescription) on the campus or on any off-campus location during related School experiences is prohibited. Violators are subject to School disciplinary action, criminal prosecution, fine and imprisonment. The Delaware state underage drinking laws are strictly enforced.

A student who is taking a prescribed legal drug which could affect his or her performance is responsible for notifying the Director of Education and providing a physician's certificate stating that he or she is able to safely and efficiently perform the assignments of a student.

Upon one violation of the School Substance Abuse policy, the student may be permanently terminated from the school. Refer to the Drug-Free School and Workplace Policy for additional information.

The School has a relationship with Brandywine Counseling of Wilmington to provide behavioral health and substance abuse services for students and employees. The program provides services related to drug use and abuse including education programs, counseling services and referrals. The phone number is 302-454-3020.

Weapons

Possession, use and/or sale of weapons, firearms or explosives are forbidden on the School campus. This policy applies to all students and employees, including those who have a valid “concealed carry” permit.

Students and employees who are aware of violations or threats to violate this policy are required to immediately report such violations or threats to the executive staff. Violations to this policy will result in disciplinary action, up to and including expulsion and/or discharge.

Emergency Notification and Timely Warnings:

Alerting the School Community

Timely Warnings

In the event that a situation arises that constitutes an “immediate” threat, a school wide “timely warning” will be issued. The warning will be issued through the School’s telephone system, faculty cell phones, e-mails and classroom announcements as circumstances permit. Any individual with information warranting a timely warning should report the circumstances to the Director of Education or Campus President as soon as possible.

“Immediate” Threat

An “immediate” threat as used here encompasses an imminent or impending threat, such as an approaching tornado, hurricane or other extreme weather conditions. Other examples of an immediate threat include, but are not limited to:

- Gas Leak
- Terrorist Incident
- Bomb Threat
- Rioting
- Explosion
- Serious Illness Outbreak
- Nearby Chemical Spill

Notification Procedure

The institution will, without delay, and taking into consideration the safety of the school community, determine the content of the notification and initiate the notification process, unless the notification will compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency. The Campus President or Director of Education, or his/her representative, will confirm the type of emergency and will determine what emergency response agencies will be notified.

Testing Emergency Response and Evacuation Procedures

An evacuation drill is scheduled in the fourth quarter (October, November or December) of each year to test the effectiveness of the procedures. Students are NOT notified in advance of the drills in order to more accurately assess the procedure. Faculty and staff will communicate information to students regarding the developing situation or evacuation plans. **Please adhere**

to guidance from faculty and staff in an orderly and calm manner.

Policy Statements:

Sex Offenses and Offenders

Sex Offender Registration

In accordance with the “Violent Crime Control and Law Enforcement Act of 1994” and the “Campus Sex Crimes Prevention Act of 2000”, students may access the Delaware Sex Offender Central Registry website at <https://sexoffender.dsp.delaware.gov/> for information concerning registering sex offenders who might be present on campus. This website includes only those registered sex offenders who have been classified by the courts as moderate-risk (tier 2) or high risk (tier 3). Those offenders classified as low-risk (tier 1) are not displayed on the public website. If computer access is not available, the Delaware State Police Department may be contacted directly at 302-739-5882. The Delaware State Police Department is responsible for maintaining this registry. Any person who uses the information contained on this registry to threaten, intimidate, or harass the registrant or their family, or who otherwise misuse this information, may be subject to criminal prosecution or civil liability. If you have reasonable belief that any of the information on this website is outdated or incorrect, please contact the Delaware State Police Department.

Sexual Assault Prevention and Response

The School has a “zero” tolerance for sexual assault and/or harassment. If you are a victim of sexual assault at this institution, your first priority is to get to a place of safety. The next step is to obtain any necessary medical treatment. The School strongly advocates that a victim of sexual assault reports the incident in a timely manner. Time is a critical factor in evidence collection and preservation. An assault should be reported directly to the Campus President or Director of Education. Filing a report to the President/Director will not obligate the victim to prosecute. However, a School, senior executive will assist a sexual assault victim with notifying the proper authorities if requested by the victim. Filing a police report with the local Police Department will:

- Ensure the victim will receive the necessary medical treatment and tests at no expense,
- Provide the opportunity for the collection of evidence helpful in prosecution,
- Ensure the victim has access to free, confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

A student and/or employee found guilty of violating sexual misconduct laws will be sentenced by state court guidelines and he/she will be expelled / discharged from the School on the first offense.

Personal Awareness

A safe environment is everyone’s responsibility. All individuals are encouraged to use personal awareness and good judgment to not place themselves in compromising situations that could lead to sexual assault and/or unwelcome sexual advances. Always be aware of your personal surroundings.

How to Be an Active Bystander

Bystanders play a critical role in the prevention of sexual and relationship violence. They are “individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it.”

Bystander intervention involves safe and positive options that may be carried out by an individual to prevent harm or to intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene.

The School promotes a culture of community accountability in which bystanders are actively engaged in the prevention of violence without causing further harm. However, individuals may not always know what to do even if they want to help. Below is a list of some ways to be an active bystander. If you or someone else is in immediate danger, dial 911 on campus phones or on your cell phone. This is always an option if you feel it is not safe for you to intervene.

- 1) Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
- 2) Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
- 3) Speak up when someone discusses plans to take sexual advantage of another person.
- 4) Contact the facility manager or party host if you think someone may be in trouble.
- 5) Distract the possible abuser by spilling a drink or telling them their car is being towed or that the police have been called.

Risk Reduction

With no intent to blame victims, and recognizing that only abusers are responsible for their actions, the following are some strategies to reduce one's risk of sexual assault or harassment (taken from the Rape, Abuse, & Incest National Network, www.rainn.org).

- 1) Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- 2) Try to avoid isolated areas. It is more difficult to get help if no one is around.
- 3) Walk with purpose. Act like you know where you are, even when you do not.
- 4) Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- 5) Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- 6) Make sure your cell phone is with you and charged and that you have money for transportation if needed.
- 7) Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
- 8) Avoid putting music earbuds in both ears so that you can be more aware of your surroundings, especially if you are walking alone.
- 9) When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together.

- 10) Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911).
- 11) Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you have left your drink alone, just get a new one.
- 12) Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from punch bowls or other large, common open containers.
- 13) Watch out for your friends and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get them to a safe place immediately.
- 14) If you suspect you have, or a friend has, been drugged, contact law enforcement immediately (local authorities can be reached by calling 911).
- 15) If you need to get out of an uncomfortable or scary situation, here are some things that you can try:
 - a. Remember that being in this situation is not your fault. You did not do anything wrong; the other person who is making you uncomfortable is to blame.
 - b. Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
 - c. Have a code word with your friends or family so that if you don't feel comfortable, you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
 - d. Lie. If you don't want to hurt the person's feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
- 16) Try to think of an escape route. How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
- 17) If you and/or the other person have been drinking, you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

Programs to Prevent Domestic Violence, Dating Violence, Sexual Assault, and Stalking

All new employees are instructed on crime awareness, prevention, and campus security during the hiring process. Employees are instructed on crime awareness, prevention and campus security during staff/faculty meetings, and are also encouraged to take responsibility for their own security, as well as their fellow co-workers and students. Employees are also required to take ongoing training throughout the year on subjects relating to crime prevention and Title IX subjects.

All new students are instructed on crime awareness, prevention and campus security during orientation, and are encouraged to take responsibility for their own security, as well as their fellow classmates and School employees. The orientation includes a description of campus security policies and procedures, suggestions on how to avoid becoming a crime victim,

evacuation plans at the institution, and procedures for reporting any criminal activity or emergency. In addition to the Annual Campus Safety and Security Report, students and employees are notified of specific security concerns as they arise throughout the year.

Title IX of the Education Amendments of 1972, VAWA, and the Cleary Act

Statement of Non-Discrimination

Dawn Career Institute ("School") is committed to maintaining a safe and healthy educational and work environment free from discrimination or harassment based on age, race, color, sex, gender, sexual orientation or identity, religion or creed, national or ethnic origin, or disability.

All students and employees are expected to comply with this Title IX Policy and take appropriate measures to create an atmosphere free of harassment and discrimination. Any inquiries regarding Title IX or the school's Title IX Policy and Procedures can be directed to the Title IX Coordinator as provided below, the U.S. Assistant Secretary of Education for Civil Rights, or both.

Overview

This policy provides our school community members with information and guidance to assist those who have experienced or been affected by sexual or gender-based misconduct. This policy supersedes any and all other school policies, processes, and/or handbooks relative to the handling of sexual or gender-based misconduct governed by Title IX.

This policy contains information regarding the procedures for information shared with or reported to the Title IX Coordinator involving allegations of sexual discrimination, sexual harassment, sexual assault, fondling, dating violence, domestic violence, stalking, and retaliation. This policy prohibits a broad continuum of behaviors, all which constitute a form of sexual or gender-based discrimination or harassment. This document may use the term "sexual or gender-based misconduct" to refer to any or all those prohibited behaviors.

In accordance with Title IX of the Education Amendments of 1972 and 34 C.F.R. Part 106, the school does not discriminate on the basis of sex, including in admissions and employment, nor will it permit or tolerate sex discrimination or sexual harassment against a student, employee, or other member of the school community.

The school is committed to taking all appropriate steps to eliminate sexual and gender-based harassment, sexual assault, fondling, dating violence, domestic violence, stalking, prevent their recurrence and address their effects.

All school proceedings are conducted in compliance with the requirements of Title IX, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), the Violence Against Women Act (VAWA), the Family Educational Rights and Privacy Act (FERPA), other applicable federal, state and local laws and regulations.

Inquiries or complaints concerning the application of Title IX may be referred directly to the school's Title IX Coordinator:

Shaun Carney, Campus President – 302-273-3560

How to Make a Report or Formal Complaint of an Alleged Title IX Violation

Any person may report alleged sex discrimination, sexual harassment, or retaliation to the Title IX Coordinator, irrespective of whether the reporting person is the alleged victim of such conduct. A report is differentiated from a Formal Complaint ("Complaint"), which is a document filed/signed by the Complainant or signed by the Title IX Coordinator alleging sexual harassment and requesting the School investigate the allegation(s) and implement the School's Grievance Process. A report or complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail at any time.

After Making a Report or Formal Complaint

Upon receipt of a report or Complaint, the Title IX Coordinator shall undertake an initial assessment to determine appropriate next steps as required under this Policy, including making an initial threat assessment to ensure there is no immediate danger to Complainant or the school community and, if there is, to take appropriate action, which may include emergency removal of Respondent as described below.

The Coordinator shall contact Complainant to discuss the availability of appropriate supportive measures that may be implemented with input from the Complainant irrespective of, and in addition to, any resolution process including the formal Grievance Process, and will notify Complainant about the right to have an advisor. If the report has been made without filing a Complaint, the Title IX Coordinator will review the allegations and discuss options with the Complainant, including the option of proceeding with a Complaint. If the Complainant does not want to proceed with a Complaint, the Coordinator may initiate a Complaint if the Coordinator determines that a Complaint is warranted.

If the Complainant files a Complaint, or the Title IX Coordinator initiates a Complaint, the matter will proceed as described under the Grievance Process.

After submission of a Complaint and after notifying the Respondent of the Complaint's allegations, the parties will be notified of the availability of informal resolution, as applicable. All parties must voluntarily consent in writing to any informal resolution process. The parties may withdraw such consent at any time and resume the formal Grievance Process.

At all stages of the process, irrespective of any resolution or grievance process which may be implemented, responsive and reasonable supportive measures will be implemented to ensure continued access to the School's educational program or activities.

Emergency Removal of Respondent

The School reserves the right to remove a Respondent from its education program or activities on an emergency basis when the Respondent poses an immediate threat to the health or safety of any student or campus community member. The School will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns.

Administrative Leave of Employee Respondent

Respondents who are School employees may be placed on administrative leave during the pendency of a grievance process as determined by the School and the Title IX Coordinator.

Complainant's Decision to Pursue a Complaint

If a Complainant does not wish to be identified, does not wish for an investigation to take place, or does not want a Complaint to be pursued, the Complainant may make such a request to the Title IX Coordinator, who will evaluate the request in light of the duty to ensure campus safety and compliance with state and federal law. The School will comply with Complainant's wishes unless the Coordinator determines that initiating a Complaint is warranted under the circumstances.

If the Coordinator independently initiates a Complaint, the Complainant may have as much or as little involvement in the process as the Complainant desires. The Complainant retains all rights of a Complainant under this Policy irrespective of participation level. Irrespective of whether a Complaint is filed, the School shall offer supportive measures to ensure Complainant's continued access to the School's educational program and activities. If the Complainant elects not to file a Complaint, the Complaint shall retain the right to file a Complaint later.

Complaint Dismissal

Mandatory Dismissal

The School must dismiss a Complaint if, at any time during the investigation or hearing, it is determined that:

1. The conduct alleged in the Complaint does not constitute sexual harassment as defined in under Title IX; and/or
2. The conduct did not occur in an educational program or activity controlled by the School (including buildings or property controlled by recognized student organizations); and/or
3. The School does not have jurisdiction over the Respondent; and/or

4. The conduct did not occur against a person in the United States; and/or
5. At the time of filing a Complaint, the Complainant is not participating in or attempting to participate in the education program or activity of the School.

Discretionary Dismissal

The School may dismiss a formal complaint or any allegations therein if at any time during the investigation or hearing:

1. A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Complaint or any allegation therein; or
2. The Respondent is no longer enrolled in or employed by the School; or
3. Circumstances prevent the School from gathering evidence sufficient to reach a determination as to the Complaint or allegations therein.

Dismissed Complaints may include conduct that could be considered a potential violation of the School's Code of Conduct or Employee Handbook and may be addressed through other applicable, non-Title IX conduct policies and procedures accordingly.

Alternative Resolution

After an initial assessment of the alleged facts, The Title IX Coordinator may, if both parties agree, begin an Alternative Resolution process.

Alternative Resolution may include, among other responses:

- Referral for disciplinary action;
- Reach an agreement between the parties;
- Refer the Respondent to targeted preventive educational and training programs; and
- Conduct a follow-up review to ensure the resolution has been carried out effectively.

Except for the limitations stated above, the Title IX Coordinator has sole discretion to determine whether the complaint is appropriate for Alternative Resolution, to determine the type of resolution to pursue, and to stop the process at any time before its conclusion and move to a Formal Investigation. Participation in Alternative Resolution is voluntary, meaning both the Reporting and the Responding Parties must mutually agree to participate. If Alternative Resolution is selected, the Title IX Coordinator will provide notice to both parties that:

- The Title IX Coordinator has begun the process;
- The process is voluntary and will end upon either party's request;
- Termination of Alternative Resolution may result in Formal Investigation;

- They may be accompanied by an advisor throughout the process; and The Title IX Coordinator will notify both parties of the process's outcome. Conclusion of the Alternative Resolution process will preclude the parties from resuming a formal complaint arising from the same allegations unless the parties failed to satisfy the terms of the agreement.

The Title IX Coordinator will conduct the Alternative Resolution process unless good cause requires another individual. The Title IX Coordinator will endeavor to complete the Alternative Resolution process promptly, typically within 60 business days of notifying the parties in writing of starting the process. However, the Title IX Coordinator may extend the Alternative Resolution process past 60 days for good cause. The Title IX Coordinator will notify the parties in writing of the reason for any extension and the projected new timeline. The actual time required will depend on the specific circumstances, including the complexity of the allegations and the nature of the alleged conduct.

Once the parties have agreed to the terms of an Alternative Resolution, the School will not conduct a formal investigation unless the Title IX Coordinator determines the Respondent failed to satisfy the terms of the Alternative Resolution.

Consolidated Complaints

If a Complaint involves one or more Complaint, Complainant and/or Respondent and allegations arising out of the same set of circumstances, the School may elect to consolidate complaints.

Time Limits on Reporting

There is no time limitation on making a report or Complaint. However, acting on reports or Complaints is significantly impacted by the passage of time and occurrence of other events (including, but not limited to, the rescission or any revision of this Policy), and is at the discretion of the Title IX Coordinator, who may, among other things, document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate. Additionally, if the Respondent is no longer subject to the School's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible.

Anonymous Report or Complaint

If a Complainant makes a report anonymously, the report will be investigated by the School to the extent possible, both to assess the underlying allegation(s) and to determine if supportive measures or remedies can be provided. Anonymous reports typically limit the School's ability to investigate and respond, depending on what information is shared. In some situations, the Title IX Coordinator may proceed with the issuance of a Formal Complaint even when the Complainant's report has been made anonymously.

Confidentiality

The School shall undertake reasonable efforts to preserve the confidentiality of reports and Complaints. The School shall not disclose any report or Complaint except as provided herein and as necessary to effectuate this Policy, or as permitted by the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g; FERPA regulations, 34 CFR part 99, or as required under applicable law.

Supportive Measures

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the School's education program or activity, including measures designed to protect the safety of all parties or the School's educational environment, and/or deter harassment, discrimination, and/or retaliation.

The Title IX Coordinator promptly makes supportive measures available upon receipt of a report or a complaint alleging possible sexual harassment. At the time supportive measures are offered, the School will inform the Complainant, in writing, that they may file a Formal Complaint with the School either at that time or in the future, if they have not done so already. The Title IX Coordinator works with the Complainant to ensure their wishes are considered with respect to the supportive measures that are planned and implemented.

The School shall maintain the confidentiality of the supportive measures to the greatest extent reasonably practicable, provided confidentiality does not impair the School's ability to provide supportive measures or otherwise fulfill its obligations under this Policy. The School will implement measures in a way that does not unreasonably burden the other party.

Supportive measures may include, but are not limited to, counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, referral to medical or healthcare services, referral to community-based services, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

Right to an Advisor

The parties have the right to select an advisor of their choice to accompany them to any or all meetings and interviews during the resolution process. There are no limits on who can serve as an advisor; this advisor may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with them throughout the resolution process. Under Title IX, cross-examination is required during the hearing, and must be conducted by the parties' advisors. If a party selects an advisor of their choice, this advisor must perform cross-examination on their behalf during the hearing, as the parties are not permitted to directly cross-examine each other or any witnesses. If a party does not have an advisor, or the

advisor does not appear for a hearing, the School will provide one for the limited purpose of conducting cross-examination on behalf of the party.

An advisor who is also a witness to the allegations in the complaint creates potential for bias and conflict-of-interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-maker(s) and may, but will not necessarily, impact the Final Determination.

The School cannot guarantee equal advisory rights, meaning that if one party selects an advisor who is an attorney, but the other party does not select or retain an attorney or cannot afford an attorney, the School is not obligated to provide the other party with an attorney.

Conflict-of-Interest & Bias

Title IX Personnel are trained to ensure they have no conflict of interest and are not biased for or against any party in a specific case, or for or against Complainants and/or Respondents, generally.

Retaliation

The School prohibits retaliation under this Policy. Retaliation may include intimidating, threatening, coercing, harassing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by law or policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy and procedure. Alleged retaliation should be reported immediately to the Title IX Coordinator and will be promptly investigated. The School will take appropriate action to protect individuals who fear that they may be subjected to retaliation.

Mandatory Reporters

We have identified mandated reporters who are required under the school policy to report known or suspected discrimination to the Title IX Coordinator. Each member of the Campus Management Team is a mandated reporter. In these cases, after receiving a report, the school will act to stop, remedy, and prevent future recurrence of prohibited conduct through the application of this Policy.

Notice, Dissemination, and Publication of Policy

Title IX requires the school to notify applicants for admission or employment as well as students, employees, and, if applicable, unions or professional organizations holding collective bargaining of collective agreements with this Policy. The school complies with Title IX's notice requirements, including prominently publishing its Non-Discrimination & Grievance Procedure Policy and contact information for the Title IX Coordinator on our website and in other publications.

Sexual Harassment Defined, Jurisdiction & Scope of Policy

Sexual Harassment Defined

For purposes of this Policy and the grievance process, Sexual Harassment has the meaning set forth below. Sexual Harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, gender, and/or gender identity of those involved.

Sexual Harassment means:

Conduct on the basis of sex that satisfies one or more of the following:

1) Quid Pro Quo, defined as:

a. A School employee, conditions the provision of an aid, benefit, or service of the School, on an individual's participation in unwelcome sexual conduct.

2) Sexual Harassment, defined as:

a. unwelcome conduct, determined by a reasonable person, to be so severe, and
b. pervasive, and, objectively offensive, that it effectively denies a person equal access to the School's education program or activity.

3) Sexual assault, defined as:

Any sexual act directed against another person, without the consent of the Complainant, including instances in which the Complainant is incapable of giving consent.

4) Dating Violence, defined as:

a. violence, on the basis of sex, committed by a person,
b. who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.

5) Domestic Violence, defined as:

a. violence, on the basis of sex, committed by a current or former spouse or intimate partner of the Complainant

6) Stalking, defined as:

a. engaging in a course of conduct, on the basis of sex,
i. directed at a specific person, that would cause a reasonable person to fear for the person's safety, or the safety of others; or suffer substantial emotional distress.

For the purposes of this definition—

(i) Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

- (ii) Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

Force, Coercion, Consent, and Incapacitation

As used in the offenses above, the following definitions and meanings apply:

Force: Force is the use of physical violence and/or physical imposition to gain sexual access. Force also includes threats, intimidation (implied threats), and coercion intended to overcome resistance or produce consent.

Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Silence or the absence of resistance alone is not consent. Consent is not demonstrated by the absence of resistance. While resistance is not required or necessary, it is a clear demonstration of non-consent.

Consent: Consent is knowing permission to engage in sexual activity that is voluntarily given through clear verbal communication or by unambiguous behavior.

If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

Proof of consent or non-consent is not a burden placed on either party involved in an incident. Instead, the burden remains on the school to determine whether this Policy has been violated. The existence of consent is based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred and any similar, previous patterns that may be evidenced.

Sexual Harassment Defined, Jurisdiction & Scope of Policy

Sexual Harassment Defined

For purposes of this Policy and the grievance process, Sexual Harassment has the meaning set forth below. Sexual Harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, gender, and/or gender identity of those involved.

Sexual Harassment means:

Conduct on the basis of sex that satisfies one or more of the following:

1) Quid Pro Quo, defined as:

- a. A School employee, conditions the provision of an aid, benefit, or service of the School, on an individual's participation in unwelcome sexual conduct.

2) Sexual Harassment, defined as:

- a. unwelcome conduct, determined by a reasonable person, to be so severe, and
- b. pervasive, and, objectively offensive, that it effectively denies a person equal access to the School's education program or activity.

3) Sexual assault, defined as:

Any sexual act directed against another person, without the consent of the Complainant, including instances in which the Complainant is incapable of giving consent.

4) Dating Violence, defined as:

- a. violence, on the basis of sex, committed by a person,
- b. who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.

5) Domestic Violence, defined as:

- a. violence, on the basis of sex, committed by a current or former spouse or intimate partner of the Complainant

6) Stalking, defined as:

- a. engaging in a course of conduct, on the basis of sex,
 - i. directed at a specific person, that would cause a reasonable person to fear for the person's safety, or the safety of others; or suffer substantial emotional distress.

For the purposes of this definition—

- (iii) Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- (iv) Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

Force, Coercion, Consent, and Incapacitation

As used in the offenses above, the following definitions and meanings apply:

Force: Force is the use of physical violence and/or physical imposition to gain sexual access. Force also includes threats, intimidation (implied threats), and coercion intended to overcome resistance or produce consent.

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Stop Campus Hazing Act (SCHA)

This Policy conforms to the Stop Campus Hazing Act (SCHA) regulations, which took effect January 1, 2025.

The Stop Campus Hazing Act (SCHA) amends the Higher Education Act of 1965 to require colleges and universities to disclose hazing incidents in their annual security reports. It mandates institutions to define hazing, compile statistics on reported cases, and establish transparent policies for reporting and prevention. The Act also requires institutions to implement research-based prevention programs and ensure compliance with local, state, and tribal laws, enhancing student safety and accountability.

Upon receiving a complaint of hazing (see definition below), the School will take reasonable and prompt steps to stop any such conduct, prevent its recurrence, determine what occurred, and remedy any subsequent effects. The School provides all parties with opportunities to present facts, identify witnesses, and reach reasonable conclusions based on the evidence collected. The School will take appropriate action against those engaging in hazing, including disciplinary measures when warranted, up to and including permanent separation from the institution.

The School will maintain and publicly report findings of hazing violations by any student organization. The report will include any violations of the code of conduct, anti-hazing policies, or state or federal laws relating to hazing or offenses related to alcohol, drugs, sexual assault, or physical assault.

Definition

Hazing: Hazing is any expressed or implied action, activity, or expectation of someone seeking to join or participate in a group or student organization that humiliates, degrades, abuses, or endangers a person, regardless of the person's willingness to participate.

Hazing includes any intentional, knowing, or reckless act committed by a person or group, regardless of whether the victim consents, that:

1. Occurs during initiation, affiliation, or membership maintenance in a student organization, whether the organization is established or recognized by the institution.
2. Creates a risk (beyond ordinary activities) of physical or psychological injury, including:
 - Physical Abuse.
 - Forced consumption of substances.
 - Sleep deprivation, exposure to elements, or extreme calisthenics.
 - Sexual exploitation or coercion.
 - Threats and/or intimidation.
3. Any act violating local, state, tribal, or federal laws

This includes participating in, condoning, encouraging, requiring, observing, or allowing an opportunity for hazing. Any violation of Hazing prohibitions in the Student Conduct Code of Conduct or state law, and any act of Hazing as defined in the Stop Campus Hazing Act.

Campus Hazing Transparency Report

The key requirement of the Stop Campus Hazing Act, the Campus Hazing Transparency Report, is designed to enhance public awareness of hazing incidents in higher education and help create a system of accountability. It mandates that colleges and universities participating in federal financial aid programs collect and publicly disclose information about student organizations found responsible for hazing violations.

Key Features of the Report:

1. Collection of Information:

- Institutions must begin gathering hazing incident data by July 1, 2025.
- Incidents concerning student organizations that are established or recognized by the institution are found to violate the institution's standards of conduct relating to hazing.

Public Availability:

- The report must be made available on the institution's public website within 12 months of the Act's enactment.
- It must be updated at least twice a year to reflect new incidents.
- The report must remain publicly available for at least five years after publication.

2. Contents of the Report:

For each hazing violation, the report must include:

- Name of the student organization involved.

- A general description of the violation that resulted in a finding of responsibility, including whether the violation involved the abuse or illegal use of alcohol or drugs, the findings of the institution, and any sanctions placed on the student organization by the institution, as applicable. Institution's findings and any sanctions imposed on the organization.
- Key dates, including:
 - When the alleged incident occurred.
 - When the investigation started and concluded.
 - When the institution notified the organization of the findings.
- The report must not include personally identifiable information about individual students, ensuring compliance with the Family Educational Rights and Privacy Act (FERPA).

Reporting

All members of the school community have a duty to promptly report good-faith concerns about potential hazing that may impact another member of the campus community. Specifically, if any such individual holds firsthand knowledge about hazing, whether that hazing has already occurred or is set to occur in the future, they must make a reasonable effort to report the hazing-related information immediately.

A victim or witness of hazing has the right to file a Formal Complaint against anyone engaging in hazing. To initiate a Formal Complaint, a Complainant must contact the Title IX Coordinator.

Good Faith Reporting and Amnesty

Students who report hazing in good faith will not face disciplinary action for minor policy violations (e.g., drinking on campus) uncovered as part of the investigation. This provision aims to encourage reporting and prioritize student safety.

Retaliation

Submission of a good-faith complaint of hazing will not affect the complainant's future grades, learning, or academic environment. The School will discipline or take appropriate action against anyone who retaliates against any person who reports an incident of hazing, who testifies, assists or participates in a proceeding, investigation or hearing related to such hazing.

Compliance With This Policy

Hazing perpetrators will face disciplinary action in accordance with applicable policies and procedures, up to and including termination from The School.

Jurisdiction of the School

If the Respondent is unknown or is not a member of the School community, the Title IX Coordinator will assist the Complainant as requested in identifying appropriate school and local resources and support options and/or, when criminal conduct is alleged, in contacting local law enforcement to file a police report upon request.

Further, even when the Respondent is not a member of the School's community, supportive measures, remedies, and resources may be accessible to the Complainant by contacting the Title IX Coordinator. In addition, the School may take other actions as appropriate to protect the Complainant against third parties, such as barring individuals from School property and/or events.

Scope of the School's Educational Program and Activities

For purposes of this Policy, the School's educational program or activities includes locations, events, or circumstances, within the U.S., where the School exercises substantial control over both the Respondent and the context in which the alleged sexual harassment or discrimination occurs and also includes any building owned or controlled by the School or by a student organization that is officially recognized by the School.

Formal Grievance Process

If a Formal Complaint is filed, and not addressed through the informal resolution process, the matter will proceed through the Grievance Process as outlined below and will include an objective investigation, live hearing with opportunity for cross-examination and the right to appeal. This process will treat complainants and Respondents equitably. Any provisions, rule or practice adopted by the School as part of the grievance process, other than those required under Title IX and its implementing regulations, will apply equally to both parties. The process will include an objective evaluation of all relevant evidence (inculpatory and exculpatory), will be conducted by trained Title IX Personnel, free from any known conflict of interest or bias, and presumes Respondent's non-responsibility until and unless demonstrated otherwise by the evidence and after a Final Determination as been rendered. The Title IX Coordinator will provide written notice of the allegations to the Respondent and Complainant upon receipt of a Formal Complaint. Disciplinary sanctions or punitive measures will not be imposed against a Respondent unless and until there has been a finding of responsibility after application of the process. If at any stage of the investigation it is determined that conditions exist warranting dismissal, the complaint will be dismissed. Complainant will continue to be entitled to appropriate supportive measures in such cases.

Investigation

Investigators will be assigned to investigate allegations contained in a formal complaint and will do so objectively. The burden to collect all evidence related to the allegations, including both inculpatory and exculpatory, rests on the School, and not on the parties. Investigators must be free from bias and conflicts of interest. Depending on the complexity of the case, more than one Investigator may be assigned.

Investigation Timeline

The School will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the parties to update them on the progress and timing of the investigation. The School may undertake a reasonable delay in its investigation under appropriate circumstances. Such circumstances include, but are not limited to, a concurrent law enforcement investigation, the need for language assistance, the absence of parties and/or witnesses, and/or accommodations for disabilities or health conditions. The School will communicate in writing the anticipated duration of the delay and reason to the parties and provide the parties with status updates as warranted. The School will promptly resume its investigation and resolution process as soon as feasible. During such a delay, the School will implement supportive measures as deemed appropriate. The School's grievance process is an administrative procedure required under Title IX to address sexual discrimination, and therefore is separate and independent of any law enforcement investigation or criminal proceedings.

The Investigation Process

Investigators serve free from conflict of interest, objectively, and without bias. All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses and obtaining available, relevant evidence. The School, not the parties, bears the burden of gathering evidence and burden of proof. Parties have equal opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record.

The investigation will be conducted within a reasonably prompt timeframe, allowing for thorough collection and evaluation of all evidence related to the allegations. The investigator will keep the parties informed as to estimated timelines, and any delays.

Prior to the conclusion of the investigation, the parties will be provided with an electronic or hard copy of the draft investigation report as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation that is directly related to the allegations in the Formal Complaint, whether or not it will be used in reaching a determination. The parties will have a ten (10) business day review and comment period so each party may meaningfully respond to the evidence.

The Investigator will incorporate any relevant feedback provided by the parties during the review process, and the final report is then shared with all parties and their advisors through electronic transmission or hard copy at least ten (10) business days prior to a hearing.

Role and Participation of Witnesses in the Investigation

Witnesses who are School employees are expected to cooperate with and participate in the School's investigation and resolution process. Failure of such witnesses to cooperate with and/or

participate in the investigation or resolution process constitutes a Policy violation and may warrant discipline.

Interviews may occur in-person or remotely. Skype, Zoom, FaceTime, WebEx, or similar technologies may be used. The School will take appropriate steps to reasonably ensure the security/privacy of remote interviews. No unauthorized audio or video recording of any kind is permitted during investigation meetings.

Evidentiary Considerations in the Investigation

The investigation includes collection of all evidence directly related to the allegations, which is not otherwise privileged. Only evidence which is also deemed relevant is summarized in the investigative report which is considered by the Decision-Maker(s), in rendering a determination of responsibility. All parties are provided the opportunity to review all non-privileged evidence gathered during the investigation which is directly related to the allegations in the complaint, whether or not it is also included in the investigative report.

Relevant evidence does not include evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such evidence is offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the evidence concerns specific incidents of the Complainant's prior sexual behavior with respect to the Respondent, and are offered to prove consent.

Privileged evidence is likewise excluded from the investigation, investigative report, and hearing unless a party expressly waives this privilege in writing and consents to the release of this information during the grievance process.

Investigative Report

Upon conclusion of the investigation, the Investigator will create an investigative report fairly summarizing relevant evidence and, at least five (5) days prior to a hearing, will send the report to each party and the party's advisor, if any, the investigative report in an electronic format or hard copy, for their review and written response.

The Hearing

Upon conclusion of the investigation and distribution of the investigative report to the parties, the matter will proceed to the hearing stage of the grievance process. The hearing will be offered live, in real-time and will include cross-examination. A Decision-maker(s) will be appointed to preside over the hearing, evaluate the evidence, and make a determination as to each allegation in the complaint. The Decision-maker will be independent, neutral, and will not have had any previous involvement with the investigation. Investigators, Title IX Coordinator (or designee), or advisors are prohibited from serving as Decision-makers.

The School reserves the right to adopt any hearing protocols, which will be applied and be made available equally to both parties, to ensure the efficiency, order, and decorum of the hearing process. The School may designate an administrative facilitator of the hearing, which may include the Title IX Coordinator, as long as they do not have a conflict of interest.

The School may conduct the hearing virtually at their discretion or upon request of a party. Request for remote participation by any party or witness should be directed to the Title IX Coordinator made at least ten business days prior to the hearing.

The Decision-maker may question the parties and any witness at the hearing. Only relevant questions, testimony, and evidence may be proffered at the hearing, and the Decision-maker will make determinations as to relevancy of every question posed by an advisor during cross-examination before it is answered, and of any evidence offered.

Privileged evidence or testimony, likewise, may not be proffered during the hearing, without a party's waiver and written consent allowing its consideration at the hearing. Parties may not conduct cross-examination. Advisors only will conduct cross-exam on a party's behalf. Only relevant questions will be allowed. Parties, advisors, witnesses, and all participating individuals are expected to behave respectfully during the hearing. Harassing, intimidating or disruptive behavior will not be tolerated, and the School reserves the right to exclude anyone from participation in the process that fails to comport themselves accordingly.

Evidentiary Considerations in the Hearing

Only Relevant Evidence Allowed

Any evidence that the Decision-maker(s) determine(s) is relevant and credible may be considered. Only evidence, which is directly related to the allegations, not subject to an enforceable legal privilege and not otherwise excludable as described here is considered relevant.

The hearing does not consider the following which are deemed not relevant:

- 1) incidents not directly related to the possible violation, unless they evidence a pattern; or
- 2) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Privileged Evidence Must be Excluded

Evidence subject to any recognized legal privilege will not be allowed in the hearing without the prior written waiver of the privilege and consent for its consideration during the grievance process.

When a Party/Witness Refuses to Submit to Cross-Examination

If a party or witness does not attend, or chooses not to submit to cross-examination at the hearing, the Decision-maker may not rely on any prior statement made by that party or witness in the ultimate determination of responsibility. The Decision-maker(s) may not draw any inference solely from a party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.

Final Determination as to Responsibility and Standard of Proof

Upon completion of the hearing, the Decision-maker will deliberate privately and will render a finding as to each allegation in the complaint by applying the preponderance of the evidence standard, which means more likely than not. If this standard is not met, the Respondent is presumed not responsible for the alleged conduct. Under the preponderance of the evidence standard, it is possible for an investigation, hearing, and/or appeal to reach an inconclusive determination.

The decision will be provided simultaneously to the parties through the issuance of a written determination letter, delivered by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official the School records, or emailed to the parties' School-issued email or otherwise approved account. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered. The determination regarding responsibility becomes final after expiration or exhaustion of any appeal rights.

Sanctions, Disciplinary Action & Remedies

The School may consider a number of factors when determining a sanction and/or remedy and will focus primarily on actions aimed at ending, and preventing the recurrence of, discrimination, harassment, and/or retaliation and the need to remedy the effects its effects on the Complainant and School community. Sanctions will be imposed upon either expiration of the appeal window, or after Final Determination on any appeal filed.

Sanctions or actions may include, but are not limited to, those listed below. These may be applied individually or in combination and the School may assign sanctions not listed, as deemed appropriate.

Student Sanctions:

Warning: A warning is an official conversation between the student and either the Dean of Education and/or Campus President. The conversation will be documented in the Student Information System but does not become a part of the student's permanent record. Further misconduct may result in more severe disciplinary sanctions.

Required Counseling: A mandate to meet with and engage in external counseling to better comprehend the misconduct and its effects.

Written Reprimand: A reprimand is the official written notification of unacceptable behavior and becomes a part of the student's permanent record. The student must sign the document. Further misconduct may result in more severe disciplinary sanctions.

Suspension: A suspension is the official loss of campus privileges for a specific period not to exceed 14 calendar days. During this time, the student is not allowed on campus, at campus functions, or on externship/clinical and will be marked as absent for any missed class sessions. Suspended students will not be allowed to attend any make-up labs, tests, exams, or competencies missed. Further misconduct may result in more severe disciplinary sanctions.

Expulsion: An expulsion is the official, permanent loss of campus privileges and results in the student being withdrawn from the institution and unable to complete the program of study. Students who are expelled receive a grade of W (withdrawal) for any courses in which they are currently enrolled.

Employee Sanctions/Actions:

- Warning – Verbal or Written
- Performance Improvement/Management Process
- Required Counseling
- Required Training or Education Probation
- Loss of Annual Pay Increase
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Suspension with pay
- Suspension without pay
- Termination
- Other Actions: In addition to or in place of the above sanctions, the School may impose any other sanction as deemed appropriate.

False Allegations and Evidence

Making deliberately false and/or malicious accusations, knowingly providing false evidence, tampering with or destroying evidence, or deliberately misleading an official conducting an investigation are policy violations subject to discipline.

Long-Term Remedies/Other Actions

Following the conclusion of the resolution process, and in addition to any sanctions imposed, the Title IX Coordinator may implement additional long-term remedies or actions with respect to the parties and/or the campus community that are intended to stop the harassment, discrimination, and/or retaliation, remedy the effects, and prevent reoccurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Alteration of work arrangements for employees
- Provision of campus safety escorts
- Implementation of long-term contact limitations between the parties
- Adjustments to academic deadlines, course schedules, etc.
- Modified campus security measures

At the discretion of the Title IX Coordinator, certain long-term support or measures may also be provided to the parties even if no Policy violation is found.

The School will maintain the privacy of any long-term remedies, provided privacy does not impair the School's ability to provide these services.

Failure to Comply with Disciplinary Sanctions or other Remedies

Respondents are expected to comply with any disciplinary sanction or remedy as set forth in the Final Determination or in response to a final outcome. Failure to abide by the sanction(s)/action(s) whether by refusal, neglect, or any other reason, may result in additional disciplinary action, including suspension, expulsion, and/or termination.

Appeals

Any party may file an Appeal on the following grounds. Appeals must be submitted in writing to the Title IX Coordinator within five (5) days of the delivery of the Notice of Outcome. After expiration of the appeal window, the determination will be considered final, and any applicable sanctions will be imposed.

Grounds for Appeal

Appeals may be made on the following bases:

1. Procedural irregularity that affected the outcome of the matter;
2. New evidence not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter; and
3. The Title IX Coordinator, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter.

Any sanctions imposed as a result of the Final Determination are stayed during the appeal process. Title IX personnel with prior involvement in the matter will not be permitted to serve as a Decision-maker in the appeal. Appeals will not include a hearing. A decision on the merits will be based on information provided in the appeal document. If an appeal is based on the availability of new evidence, this evidence must be described with specificity and must be available for review within a reasonably prompt timeframe for consideration.

The appeal outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, and the rationale supporting the findings. Appeal decisions will be made within seven (7) business days, barring exigent circumstances, including the review of new evidence not immediately available for submission with the appeal request.

Notification of the appeal outcome will be made in writing and will be delivered simultaneously to the parties by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official School records, or emailed to the parties' School-issued email or otherwise approved account. Once mailed, e-mailed and/or received in-person, notice will be presumptively delivered. Decisions on appeal are considered final.

Record Retention

The School shall maintain records related to the implementation of this Policy for at least seven (7) years.

Revision of this Policy

This Policy and procedures supersede any previous policy(ies) addressing harassment, sexual misconduct, discrimination, hazing, and/or retaliation under Title IX and will be reviewed and updated subject to any relevant change in law or School policy, and on a recurring periodic basis, by the Title IX Coordinator. The School reserves the right to make changes to this Policy as necessary, which become effective when published.

This Policy will not restrict any rights guaranteed against government action by the U.S. Constitution and should be interpreted accordingly and should also be construed to comply with the most recent government regulations or applicable judicial decisions.

This document does not create legally enforceable protections beyond the protection of the background state and federal laws which frame such policies and codes, generally.

Crime Statistics 2023 - 2025

Criminal Offenses

Offense	On-Campus			Non-Campus			Public Property		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities									
Additional Copies of The Annual Report Are Available in The Registrar's Office									

Hate Crimes

Hate Crimes: On Campus	2023							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: On Campus	2024							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: On Campus	2025							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Non Campus	2023							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Non Campus	2024							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Non Campus	2025							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Public Property	2023							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Public Property	2024							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Hate Crimes: Public Property	2025							
	Race	Religion	Sexual Orientation	Gender	Disability	Ethnicity	National Origin	Gender Identity
Murder/N on- Negligent	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0
Larceny- thefts	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0
Destruction/ Damage/ Vandalism to Property	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities								
Additional Copies of The Annual Report Are Available in The Registrar's Office								

Violations

Offense	On-Campus			Non-Campus			Public Property		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Liquor Law Violations									
Arrests	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0
Drug Abuse Violations									
Arrests	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc. Arrests									
Arrests	0	0	0	0	0	0	0	0	0
Disciplinary Action	0	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities									
Additional Copies of The Annual Report Are Available in The Registrar's Office									

Statistics in accordance with the Violence Against Women Reauthorization Act of 2013:

Offense	On-Campus			Non-Campus			Public Property		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0
The School <u>Does Not</u> Operate or Provide Student Residential Facilities									
Additional Copies of The Annual Report Are Available in The Registrar's Office									

	Calendar Year		
	2023	2024	2025
Unfounded Crimes	0	0	0

Hazing Statistics

For the reporting period of January 1, 2025 to December 31, 2025, the School completed zero (0) investigations that resulted in a finding of responsibility for hazing violations. No student were found to have violated institutional hazing policies during this time.

Crime Statistic Definitions

These definitions are excerpted from Appendix B of the Handbook for Campus Safety and Security Reporting.

Murder/Non-Negligent Manslaughter: the willful (non-negligent) killing of one human being by another. NOTE: Deaths caused by negligence, attempts to kill, assaults to kill, suicides, accidental deaths, and justifiable homicides are excluded.

Negligent Manslaughter: the killing of another person through gross negligence.

Robbery: the taking or attempting to take anything from value of the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault: an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary that injury result from an aggravated assault when a gun, knife or other weapon is used which could or probably would result in a serious potential injury if the crime were successfully completed.

Burglary: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or a felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access, even though the vehicles are later abandoned - including joy riding)

Arson: The willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, or personal property of another kind.

Weapon Law Violations: The violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned.

Drug Abuse Violations: Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

Liquor Law Violations: The violation of laws or ordinance prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)

Hate Crimes

We are also required to report statistics for bias-related (hate) crimes by the type of bias as defined below for the following classifications: murder/non-negligent manslaughter, negligent manslaughter, sex offenses (forcible and non-forcible), robbery, aggravated assault, burglary, motor vehicle theft, arson, liquor law violations, drug abuse violations and/or weapons: possessing carrying, etc. (see definitions on the front page) and larceny-theft, destruction/damage/vandalism of property, intimidation, and simple assault (see definitions below).

Larceny: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

Vandalism: To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Simple Assault: An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.

If a hate crime occurs where there is an incident involving intimidation, vandalism, larceny, simple assault or other bodily injury, the law requires that the statistic be reported as a hate crime even though there is no requirement to report the crime classification in any other area of the compliance document.

A bias-related (hate) crime is not a separate, distinct crime, but is the commission of a criminal offense which was motivated by the offender's bias. For example, a subject assaults a victim, which is a crime. If the facts of the case indicate that the offender was motivated to commit the offense because of his bias against the victim's race, religion, sexual orientation, gender, gender identity, disability, ethnicity or national origin the assault is then also classified as a hate crime.

Sex Offenses Definitions from the National Incident-Based Reporting System Edition of the Uniform Crime Reporting Program

Sex Offenses - Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

A. Rape

The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. (This revised definition reflects the Federal Bureau of Investigation's updated definition in the Uniform Crime Reporting (UCR) Summary Reporting System, which encompasses the categories of rape, sodomy and sexual assault with an object that are used in the UCR National Incident-Based Reporting System.)

B. Fondling

The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because his/her age or because of his/her temporary or permanent mental incapacity.

C. Incest

Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

D. Statutory Rape

Sexual intercourse with a person who is under the statutory age of consent.

Violence Against Women Act Categories:

In accordance with the Violence Against Women Reauthorization Act (VAWA) of 2013, Institutions are now required to include statistics for the following:

Domestic Violence: A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabitating with the victim as a spouse or intimate partner, a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence. Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress.

Unfounded Crimes:

An institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situations where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of this full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore "unfounded". Only a sworn or commissioned law enforcement personnel may "unfound" a crime report for purposes of reporting under this section. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not "unfound" a crime report.