

Professional Skills Institute

Annual Campus Safety and Security Report

Statistical Data Period

Covered: 2015 – 2017

Distributed: September 28, 2018

Notice of Availability of Annual Safety and Security Report

A copy of the Professional Skills Institute Campus Safety and Security Report is posted to its website on an annual basis to all current PSI students and employees as part of the PSI 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 PSI 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 at the following link: [Http://proskills.edu/Safety_Security.pdf](http://proskills.edu/Safety_Security.pdf)

**Thank you,
PSI 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

Professional Skills Institute (PSI) is providing the following information to all of its employees and students as part of the PSI 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, Michael Seifert, by phone/email at: 419-720-6670, Michael.Seifert@proskills.edu.

Policy Statements:

Disclosing What We Do and How We Do It

Reporting Criminal Emergencies

Since PSI's facility does not include a campus police department, the Maumee 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. Maumee Police Officers will be responding to all "9-1-1" calls originating on the PSI campus.

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

All prospective PSI students and employees may obtain copies of this report by request to the School Registrar's office.

Campus Access Policy

During normal business hours (Monday-Friday, 9:00 am – 5:00pm, Saturday 9:00 am-1:00 pm), the PSI campus 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.

PSI does not have any officially recognized student organizations with off-campus locations. PSI 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 (419)720-6670 or visit one of the following Designated Campus Security Authorities (DCSA) to report all non-emergencies:

DCSA Offices	Ext.
Campus President - Michael Seifert -	2000
Dean of Education - Susan Lippens	5003
Director of Student Financial Aid- Lynda(Nikki)Craft	8010
Director of Admissions - Amanda Boyd	2010
Title IX Coordinator - Susan Lippens	5003

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

The PSI campus 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.

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

Campus Law Enforcement

Please call 9-1-1 for ALL emergencies. Professional Skills Institute (PSI) does not operate a campus police department. Only the Maumee Police Department and other federal, state and local police agencies have the jurisdiction to apprehend and arrest anyone involved in illegal acts on the PSI campus. Designated Campus Security Authorities are in place for reporting purposes only.

PSI 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 PSI authorities when criminal incidents occur. The PSI authorities will cooperate with the Maumee Police Department investigative staff when incidents arise that require resources, reports and information from the institute. There is no written memorandum of understanding between PSI and the Maumee Police Department.

Limited Confidential Reporting Procedures

PSI encourages anyone who is the victim of, or witness to any crime to promptly report the incident to the Maumee 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

Professional Skills Institute 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, PSI 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 PSI campus 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 PSI campus or on any off-campus location during related school experiences is prohibited. Violators are subject to PSI disciplinary action, criminal prosecution, fine and imprisonment. The Ohio 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 Professional Skills Institute’s Substance Abuse policy, the student may be permanently terminated from Professional Skills Institute. Refer to the Drug-Free School and Workplace Policy for additional information.

PSI has a relationship with Arrowhead Behavioral Health to provide behavioral health and substance abuse services in Northwest Ohio and Southeastern Michigan for students and employees. The facility offers in and out-patient services as well as mental health evaluations, 24 hours a day, 7 days a week. Their phone number is 419-891-9333 or toll-free 800-547-5695.

Weapons

Possession, use and/or sale of weapons, firearms or explosives are forbidden on the PSI 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 Professional Skills Institute Campus Community

Timely Warnings

In the event that a situation arises that constitutes an “immediate” threat, a campus 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 campus 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 Ohio Sex Offender Central Registry website at <http://www.icrimewatch.net/index.php?AgencyID=55149> 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 Maumee Police Department may be contacted directly at 419-897-7040. The Maumee 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 Maumee Police Department.

Sexual Assault Prevention and Response

PSI 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. PSI 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 Maumee 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.

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

Title IX prohibits sex discrimination in education programs and activities. Sexual misconduct

against students, including sexual harassment, sexual assault, rape, and sexual exploitation, can be a form of sex discrimination under Title IX. Please see the attached documentation for further information on the school's policies and procedures related to Title IX.

Crime Statistics

2015 - 2017

Criminal Offenses

Offense	On-Campus			Non-Campus			Public Property		
	2015	2016	2017	2015	2016	2017	2015	2016	2017
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	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
Professional Skills Institute <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

Offense	On-Campus			Non-Campus			Public Property		
	2015	2016	2017	2015	2016	2017	2015	2016	2017
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	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
Larceny-thefts	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism to Property	0	0	0	0	0	0	0	0	0

Professional Skills Institute Does Not 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		
	2015	2016	2017	2015	2016	2017	2015	2016	2017
Liquor Law Arrests	0	0	0	0	0	0	0	0	0
Liquor Law Disciplinary Action	0	0	0	0	0	0	0	0	0
Drug Abuse Arrests	0	0	0	0	0	0	0	0	0
Drug Abuse Disciplinary Actions	0	0	0	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc. Arrests	0	0	0	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc. Disciplinary Actions	0	0	0	0	0	0	0	0	0
Professional Skills Institute <u>Does Not</u> Operate or Provide Student Residential Facilities									
Additional Copies of The Annual Report Are Available in The Registrar's Office									

TITLE IX COORDINATOR

All educational institutions receiving Federal financial assistance must designate at least one employee to coordinate their efforts to comply with and carry out their responsibilities under Title IX of the Education Amendments of 1972, which prohibits sex discrimination in education programs and activities. At Professional Skills Institute, the Title IX Coordinator is Susan Lippens. Susan can be reached by phone at 419-720-6670, extension 5003, or by email at Susan.Lippens@proskills.edu

Role of the Title IX Coordinator

According to Title IX of the Education Amendments of 1972 and the U.S. Department of Education's implementing regulations at 34 C.F.R. Part 106, the school's Title IX coordinator has primary responsibility for coordinating the school's efforts to comply with and carry out its responsibilities under Title IX, which prohibits sex discrimination in all the operations of this school, as well as retaliation for the purpose of interfering with any right or privilege secured by Title IX.

Sexual misconduct against students, including sexual harassment, sexual assault, rape, and sexual exploitation, can be a form of sex discrimination under Title IX. The Title IX coordinator oversees the school's response to reports and complaints that involve possible sex discrimination to monitor outcomes, identify and address any patterns, and assess effects on the campus climate, so the school can address issues that affect the wider school community.

A student should contact the Title IX coordinator in order to:

- Seek information or training about students' rights and courses of action available to resolve reports or complaints that involve potential sex discrimination, including sexual misconduct,
- File a complaint or make a report of sex discrimination, including sexual misconduct,
- Notify the school of an incident or policy or procedure that may raise potential Title IX concerns,
- Get information about available resources (including confidential resources) and support services relating to sex discrimination, including sexual misconduct, and
- Ask questions about the school's policies and procedures related to sex discrimination, including sexual misconduct.

In the event the Title IX coordinator is not available, the following may be contacted:

- Michael Seifert, Campus President - 419-720-6670, extension 2000 or Michael.Seifert@proskills.edu

Inquiries or complaints that involve potential violations of Title IX may also be referred to the U.S. Department of Education’s Office for Civil Rights, which can be reached at 215-656-8541 or OCR.Philadelphia@ed.gov or the Educational Opportunities Section of the Civil Rights Division of the U.S. Department of Justice (DOJ): <http://www.justice.gov/crt/complaint/#three>.

Prohibited Conduct under Title IX

Prohibited Conduct

The two forms of prohibited conduct below cover both sex-based harassment, including but not limited to sexual harassment, sexual assault, and sexual exploitation, as well as harassment based on gender identity, gender expression, and nonconformity with gender stereotypes. Sample definitions for italicized terms in the two provisions are offered in the next section. In addition, in the sample definitions, terms that are further defined are also italicized.

1. No person may engage in *sex-based harassment* that creates a *hostile environment* in or under any program or activity of this school.
2. No person who is an employee or agent of this school (including a student employee) may condition a decision or benefit on a student’s submission to *sex-based harassment*, regardless of whether the student resists and suffers the threatened harm or submits and avoids the threatened harm.

Definitions

A. Sex-Based Harassment

“Sex-based harassment” includes sexual harassment and gender-based harassment.

B. Sexual Harassment

“Sexual harassment” is unwelcome conduct of a sexual nature, including but not limited to unwelcome sexual advances; requests for sexual favors; or other verbal or nonverbal conduct of a sexual nature, including rape, sexual assault, and sexual exploitation. In addition, depending on the facts, dating violence, domestic violence, and stalking may also be forms of sexual harassment.

C. Gender-Based Harassment

“Gender-based harassment” is unwelcome conduct of a nonsexual nature based on a student’s actual or perceived sex, including conduct based on gender identity, gender expression, and nonconformity with gender stereotypes.

D. Unwelcome Conduct

Conduct is considered “unwelcome” if the student did not request or invite it and considered the conduct to be undesirable or offensive.

Unwelcome conduct may take various forms, including, name-calling, graphic or written statements (including the use of cell phones or the Internet), or other conduct that may be physically threatening, harmful, or humiliating. Unwelcome conduct does not have to include

intent to harm, be directed at a specific target, or involve repeated incidents. Unwelcome conduct can involve persons of the same or opposite sex.

Participation in the conduct or the failure to complain does not always mean that the conduct was welcome. The fact that a student may have welcomed some conduct does not necessarily mean that a student welcomed other conduct. Also, the fact that a student requested or invited conduct on one occasion does not mean that the conduct is welcome on a subsequent occasion.

E. Hostile Environment

A “hostile environment” exists when sex-based harassment is sufficiently serious to deny or limit the student’s ability to participate in or benefit from the School’s programs or activities.

A hostile environment can be created by anyone involved in the school’s program or activity (e.g., administrators, faculty members, students, and campus visitors).

In determining whether sex-based harassment has created a hostile environment, the school considers the conduct in question from both a subjective and objective perspective. It will be necessary, but not enough, that the conduct was unwelcome to the student who was harassed. But the School will also need to find that a reasonable person in the student’s position would have perceived the conduct as undesirable or offensive in order for that conduct to create or contribute to a hostile environment.

To make the ultimate determination of whether a hostile environment exists for a student or students, the school considers a variety of factors related to the severity, persistence, or pervasiveness of the sex-based harassment, including: (1) the type, frequency, and duration of the conduct; (2) the identity and relationships of persons involved; (3) the number of individuals involved; (4) the location of the conduct and the context in which it occurred; and, (5) the degree to which the conduct affected one or more student’s education.

The more severe the sex-based harassment, the less need there is to show a repetitive series of incidents to find a hostile environment. Indeed, a single instance of sexual assault may be sufficient to create a hostile environment. Likewise, a series of incidents may be sufficient even if the sex-based harassment is not particularly severe.

First Amendment Considerations

This policy does not impair the exercise of rights protected under the First Amendment. The school’s sexual misconduct policy prohibits only sex-based harassment that creates a hostile environment. In this and other ways, the school applies and enforces this policy in a manner that respects the First Amendment rights of students, faculty, and others.

F. Sexual Assault

“Sexual assault” is actual or attempted sexual contact with another person without that person’s consent. Sexual assault includes, but is not limited to:

- Intentional touching of another person’s intimate parts without that person’s consent; or
- Other intentional sexual contact with another person without that person’s consent; or
- Coercing, forcing, or attempting to coerce or force a person to touch another person’s intimate parts without that person’s consent; or
- Rape, which is penetration, no matter how slight, of (1) the vagina or anus of a person by any body part of another person or by an object, or (2) the mouth of a person by a sex organ of another person, without that person’s consent.

G. Consent

“Consent” must be informed, voluntary, and mutual, and can be withdrawn at any time. There is no consent when there is force, expressed or implied, or when coercion, intimidation, threats, or duress is used. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent. Silence or absence of resistance does not imply consent. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person.

If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature, or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption that meets this standard, or being asleep or unconscious.

H. Sexual Exploitation

“Sexual exploitation” occurs when a person takes sexual advantage of another person for the benefit of anyone other than that person without that person’s consent. Examples of behavior that could rise to the level of sexual exploitation include:

- Prostituting another person;
- Recording images (e.g., video, photograph) or audio of another person’s sexual activity, intimate body parts, or nakedness without that person’s consent;
- Distributing images (e.g., video, photograph) or audio of another person’s sexual activity, intimate body parts, or nakedness, if the individual distributing the images or audio knows or should have known that the person depicted in the images or audio did not consent to such disclosure and objects to such disclosure; and,
- Viewing another person’s sexual activity, intimate body parts, or nakedness in a place where that person would have a reasonable expectation of privacy, without that person’s consent, and for the purpose of arousing or gratifying sexual desire

Reporting & Confidentially Disclosing Sexual Violence KNOW YOUR OPTIONS

The school encourages victims of sexual violence to talk to somebody about what happened – so victims can get the support they need, and so the school can respond appropriately.

Different employees on campus have different abilities to maintain a victim’s confidentiality.

- Some are required to maintain near complete confidentiality; talking to them is sometimes called a “privileged communication.”
- Other employees may talk to a victim in confidence, and generally only report to the school that an incident occurred without revealing any personally identifying information. Disclosures to these employees will not trigger a school investigation into an incident against the victim’s wishes.
- Thirdly, some employees are required to report all the details of an incident (including the identities of both the victim and alleged perpetrator) to the Title IX coordinator. A report to these employees (called “responsible employees”) constitutes a report to the school – and generally obligates the school to investigate the incident and take appropriate steps to address the situation. These employees are listed below under Option B.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual violence. The school encourages victims to talk to someone identified in one or more of these groups.

The Options

A. Privileged and Confidential Communications

- Professional and Pastoral Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the school community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX coordinator without a victim’s permission.

Following is the contact information:

Domestic Violence Empowerment Group

419-213-4994

Call for information and location

FREE support group meeting every Wednesday from 5:00 - 6:30pm for victims/survivors of Domestic Violence.

*Domestic Violence Resource Center
429 N. Michigan St.
Toledo, OH 43604
419-213-2700*

Provides information to victims of domestic violence by assisting them with filing civil protection orders, shelter, advocates, diapers and essentials for kids.

*Family and Child Abuse Prevention Center
2460 Cherry Street
Toledo, OH 43608
419-292-2927*

Case/care management for child abuse issues, child abuse counseling, child abuse prevention, child advocacy centers, child sexual abuse counseling, child sexual assault prevention and in person crisis intervention for sexually abused children.

A victim who speaks to a professional or non-professional counselor or advocate must understand that, if the victim wants to maintain confidentiality, the school will be unable to conduct an investigation into the particular incident or pursue disciplinary action against the alleged perpetrator. Even so, these counselors and advocates will still assist the victim in receiving other necessary protection and support, such as victim advocacy, academic support or accommodations, disability, health or mental health services, and changes to living, working or course schedules. A victim who at first requests confidentiality may later decide to file a complaint with the school or report the incident to local law enforcement, and thus have the incident fully investigated. These counselors and advocates will provide the victim with assistance if the victim wishes to do so. NOTE: While these professional and non-professional counselors and advocates may maintain a victim's confidentiality regarding the school, they may have reporting or other obligations under state law.

B. Reporting to "Responsible Employees."

A "responsible employee" is a school employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or who a student could reasonably believe has this authority or duty.

When a victim tells a responsible employee about an incident of sexual violence, the victim has the right to expect the school to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably.

A responsible employee must report to the Title IX coordinator all relevant details about the alleged sexual violence shared by the victim and that the school will need to determine what

happened – including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the school's response to the report. A responsible employee should not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement.

The following employees are the school's Responsible Employees:

Michael Seifert
Susan Lippens
Denise Cook
Kim Sanders
Kim Osburn
Deanna Lamb

Before a victim reveals any information to a responsible employee, the employee will ensure that the victim understands the employee's reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources.

If the victim wants to tell the responsible employee what happened but also maintain confidentiality, the employee will tell the victim that the school will consider the request but cannot guarantee that the school will be able to honor it. In reporting the details of the incident to the Title IX coordinator, the responsible employee will also inform the coordinator of the victim's request for confidentiality.

Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including for the school to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to do so.

Requesting Confidentiality from the School: How the School Will Weigh the Request and Respond.

If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the school must weigh that request against the school's obligation to provide a safe, non-discriminatory environment for all students, including the victim.

If the school honors the request for confidentiality, a victim must understand that the school's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

Although rare, there are times when the school may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students.

The school has designated the following individual(s) to evaluate requests for confidentiality once a responsible employee is on notice of alleged sexual violence: Susan Lippens, Michael Seifert.

When weighing a victim's request for confidentiality or that no investigation or discipline be pursued Susan Lippens and Michael Seifert will consider a range of factors, including the following:

The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:

- Whether there have been other sexual violence complaints about the same alleged perpetrator;
- Whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
- Whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;
- Whether the sexual violence was committed by multiple perpetrators;
- Whether the sexual violence was perpetrated with a weapon;
- Whether the victim is a minor;
- Whether the school possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
- Whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the school to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the school will likely respect the victim's request for confidentiality.

If the School determines that it cannot maintain a victim's confidentiality, the school will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the school's response and will also take immediate action as necessary to protect and assist the victim. The school will remain mindful of the victim's well-being and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or school employees, will not be tolerated. The school will also:

- Assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance;
- Provide other security and support, which could include a no-contact order, helping arrange a change of course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and

- Inform the victim of the right to report a crime to local law enforcement – and provide the victim with assistance if the victim wishes to do so.

The school may not require a victim to participate in any investigation or disciplinary proceeding. Because the school is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the school to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.

Interim and Supportive Measures to Protect Students Under Title IX

Interim measures are those services, accommodations, or other assistance that the School puts in place for victims after receiving notice of alleged sexual misconduct but before any final outcomes – investigatory, disciplinary, or remedial – have been determined. We want students to be safe, to receive appropriate medical attention, and to get the help they need to heal and to continue to access their educational opportunities. We also want students to understand their reporting options and how to access available interim measures. The school encourages victims of sexual misconduct to report those incidents to the school’s Title IX coordinator or any responsible employee with whom the victim feels comfortable. The school recognizes that sexual violence is traumatic and may leave victims feeling overwhelmed and confused. This policy seeks to provide clear guidance regarding available resources. Interim and Supportive measures may be requested of the Title IX coordinator who will work with staff to ensure implementation as necessary.

A victim of sexual misconduct, or the victim’s counselor or advocate, may request the interim measures listed below. The school – after consulting with the victim or the victim’s counselor or advocate – will determine which measures are appropriate to ensure the victim’s safety and equal access to educational programs and activities:

- Academic accommodations
- Medical and mental health services, including counseling
- Assistance in arranging for alternative school work/study arrangements and/or changing work schedules
- A “No contact” directive pending the outcome of an investigation. Such a directive serves as notice to both parties that they must not have verbal, electronic, written, or third-party communication with one another.
- Providing an escort to ensure that the student can move safely around campus
- Assistance identifying an advocate to help secure additional resources or assistance including off-campus and community advocacy, support, and services.

The school will work with victims or their counselors or advocates to identify what interim measures are appropriate in the short term (e.g., during the pendency of an investigation or other school response), and will continue to work collaboratively throughout the school's process and as needed thereafter to assess whether the instituted measures are effective, and if not, what additional or different measures are necessary to keep the victim safe.

When a victim's counselor or advocate requests any of the above measures on the victim's behalf without disclosing that sexual misconduct is the basis for the request, the school will consider these requests for supportive measures consistent with its general policy of allowing counselors and advocates to seek such measures for victims of trauma without requiring that the nature of the trauma be disclosed.