



Changing Futures. Changing Lives.

Annual Security Report
October 1, 2016

The Creative Circus
Atlanta, Georgia

2016 Annual Security Report

The Annual Security Report provides crime and safety information, policies, and procedures to The Creative Circus students, faculty, and staff. This information is provided in accordance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* or “the Clery Act.” The history of campus crime statistics and security information reporting started with the *Crime Awareness and Campus Security Act of 1990*, which amended the *Higher Education Act of 1965*. The *Crime Awareness and Campus Security Act of 1990* was renamed “the Clery Act” by the 1998 amendment.

This report includes statistics for the previous three years concerning reported crimes that occurred on-campus and on public property within or immediately adjacent to and accessible from the campus. The report also includes institutional policies concerning campus security and safety.

Reporting Crimes

Promptly report all crimes to the appropriate police agencies. For emergencies involving a crime in progress, a medical emergency, and/or fire, dial 911 immediately. Reporting crimes or other public safety incidents in a timely manner helps protect others.

All criminal activity and/or emergencies, including sexual assault, should also be promptly reported to the Campus Director and/or campus security personnel. All crimes reported to the Campus Director and/or campus security personnel will be kept confidential to the extent of the law.

Campus security personnel have a limited enforcement authority. These personnel are unarmed and do not have the power to arrest individuals. Campus security personnel, in coordination with the Campus Director, report all crimes and emergencies to the appropriate police agencies, maintain a record of such crimes, and liaise with local police agencies in obtaining relevant crime statistics for inclusion in the Annual Security Report. Any student or staff member with questions regarding the enforcement authority of campus security personnel should contact the Campus Director.

The Campus Director and/or campus security personnel are responsible for keeping a log of any criminal/emergency activity. The Regulatory Compliance department prepares the Annual Security Report annually.

The campus does not employ pastoral counselors or professional counselors, and therefore has no procedures that encourage such counselors to inform those they counsel of procedures to report crimes for inclusion in the annual disclosure of crime statistics. As stated elsewhere in this document, all criminal activity and/or emergencies, including sexual assault, should be promptly reported to the Campus Director and/or campus security personnel.

The campus does not officially recognize any student organizations with off-campus locations and has no policies regarding the monitoring of such organizations.

In the event that a situation arises, either on or off campus, that, in the judgment of the Campus Director or his/her designee, constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. The warning will be issued through various means such as e-mail, postings on the Student Portal and Faculty Portal, and/or flyers on campus.

Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, the Campus Director or his/her designee may also post a notice on the Student Portal and Faculty Portal and utilize Emergency Text Messaging, providing the campus community with more immediate notification. The Student Portal and Faculty Portal are immediately accessible via computer by all students and faculty, respectively. Anyone with information warranting a timely warning should immediately report the circumstances to the Campus Director.

2016 Annual Security Report

On campus contact numbers

David Haan - Campus Director(404) 607-8880

Off-campus contact numbers

Emergency911

Police Department (non-emergency)(404) 614-6544

Fire Department (non-emergency).....(404) 546-7000

Campus Access

All campus facilities are for the use of current students and employees only. All students and employees are required to carry his/her school-issued Identification Card at all times when on campus and to produce it when requested by Security and/or a campus official.

The campus has operating hours that range from 7:30 a.m. to 11:00 p.m., and all campus buildings are secured nightly prior to closing. The parking areas are located in well-lit areas.

Security Education

During new student registration and orientation programs, students are informed about campus security procedures and crime prevention practices, and are encouraged to be responsible for their own security and the security of others.

Annually, the staff and faculty participate in a safety update program to review current security policies.

Drug and Alcohol Policies

All employees and students are forbidden to use, possess, transfer or sell illegal drugs on company premises. Violators will be subject to disciplinary action, including immediate discharge for employees and expulsion for students.

All employees and students are forbidden to use, possess or be under the influence of alcohol on company premises. Violators will be subject to disciplinary action that may include immediate discharge for employees and expulsion for students.

All employees and students are prohibited from being under the influence of any drug on company premises. If an employee is taking a prescription or non-prescription drug that may affect job performance and/or safety, the employee's supervisor may make transportation available for the employee to the employee's home or to the home of a relative of the employee.

Any off-duty employee or student who is arrested for possession, use, being under the influence of or selling illegal drugs will be suspended pending the outcome of the judicial proceedings. The employee or student will be discharged or dismissed if subsequently convicted of a drug-related crime.

Illegal use, possession or distribution of drugs is subject to criminal legal sanctions under local, state and federal law.

Resources for Drug and Alcohol Abuse Treatment

As community and governmental concern has increased, resources for and knowledge about treatment of drug abuse have become widely available. Many communities now have resources for drug treatment that were not in existence several years ago. Large cities are likely to have a large number of resources available. Generally, those resources for treatment and aid that are part of the patient's home community are most useful. This is due to ease of access and the likelihood of continuing with the aftercare that is so important in drug abuse treatment. Various types of resources are available.

1. **Hospital Emergency Room:** These are the preferred facilities of choice when an overdose of a mind-altering drug is suspected. Since the results of overdose of many of these drugs can be life

2016 Annual Security Report

threatening, it is best to treat potential overdose situations conservatively and to obtain emergency treatment with all due speed.

2. **Police, Fire, and Paramedic Services:** If a drug-abuse situation appears especially dangerous based on the symptoms of the patient, it is wise to use these services to provide the quickest access to treatment. If the behavior of a suspected drug user is so disturbed or inappropriate that you fear it is out of control, use of police and paramedic services is also appropriate.
3. **Emergency Outpatient Treatment Facilities:** These facilities—sometimes known as “readicare, surgicare, or emergicare”—differ from fully equipped hospital emergency rooms in their ability to provide a wide range of treatment options. They also cannot provide inpatient care. In serious abuse situations, use of a hospital emergency room is to be preferred.
4. **Drug Treatment Centers:** Many types of drug treatment centers exist. Some work on an inpatient basis and some on an outpatient basis depending on the type of drug abuse involved and their philosophy of treatment. It is wise to survey your community as to the types of drug treatment centers available, the kind of patients they treat, and the economics of treatment. This information is available to faculty and administrators to be used when counseling students with regard to drug issues.
5. **Alcoholics Anonymous and Similar Organizations:** Alcoholics Anonymous is a very important resource for those dealing with alcohol abuse problems. As mentioned above, similar organizations exist to aid cocaine abusers, Cocaine Anonymous, and other drug users, Narcotics Anonymous. Contact numbers for these organizations are in your local phone book. They are non-profit, no cost groups run by their membership. Many of the most successful drug treatment programs are based on AA methods. Many communities have multiple chapters of all these organizations with multiple meetings and contact opportunities. **THEIR IMPORTANCE AS A PRIMARY RESOURCE IN DRUG ABUSE TREATMENT CANNOT BE OVER EMPHASIZED.**
6. **Community Agencies and Social Services Groups:** Many communities provide social service based facilities and groups for drug treatment. Various types of treatment methods are used, depending on the community, the range of services available and the type and severity of abuse involved. Information about such treatment resources can be obtained from your community department of social services or medical services. This information will be available to students and employees.
7. **Church Groups:** Many churches and religious organizations have programs to aid drug users and abusers. These groups are generally without fee. Information about them can be obtained from the churches directly or often through your communities social services agency.

Drug and Alcohol Hotlines

National Alcohol Hotline 800-ALCOHOL
Cocaine Anonymous 800-662-HELP
Alcohol and Drug Helpline 800-821-4357
National Council on Alcoholism and Drug Dependence Hopeline 800-622-2255
National Helpline for Substance Abuse 800-262-2463
Drug Abuse Information & Referral Line 800-662-HELP (662-4356)

2016 Annual Security Report

Sexual Misconduct Prevention

Sexual Misconduct

The school's Student Code of Conduct policy prohibits sexually violent acts, termed "Sexual Misconduct", which can be crimes as well. Sexual misconduct includes non-consensual sexual intercourse, non-consensual sexual contact, sexual exploitation, interpersonal relationship violence, sex/gender-based stalking and sexual harassment. While the school may utilize different standards and definitions than the state code, sexual misconduct often overlaps with crimes of rape, sexual assault, sexual harassment, stalking, dating violence and domestic violence.

Education and Prevention Programs

In an effort to reduce the risk of sexual misconduct as well as the crimes of rape, sexual assault, sexual harassment, stalking, dating violence and domestic violence occurring among its students, the school utilizes a range of campaigns, strategies and initiatives to provide awareness, educational, risk reduction and prevention programming.

It is the school's policy to offer programming to prevent domestic violence, dating violence, sexual assault (including stranger and known offender assaults) and stalking each year. Educational programs are offered to raise awareness for all incoming students and employees, and are often conducted during new student and new employee orientation and throughout an incoming student's first quarter. These programs and others offered throughout the year include strong messages regarding not just awareness, but also primary prevention (including normative messaging, environmental management and bystander intervention), and discuss institutional policies on sexual misconduct as well as the state definitions of domestic violence, dating violence, sexual assault, stalking and consent in reference to sexual activity. Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies and/or creating distractions.

Programs also offer information on risk reduction that strives to empower victims, how to recognize warning signals and how to avoid potential attacks, and do so without victim-blaming approaches. Throughout the year, ongoing awareness and prevention campaigns are directed to students and employees, including faculty, often taking the form of campaigns, emails, guest speakers and other events.

Resources for Counseling, Mental Health and Other Services for Victims of Sex Offenses

If you are the victim of sexual misconduct, gender-based violence or the crimes of rape, acquaintance rape, sexual assault, sexual harassment, stalking, dating violence or domestic violence, some or all of these safety suggestions may guide you after an incident has occurred:

1. Go to a safe place and speak with someone you trust. Tell this person what happened. If there is any immediate danger, contact the Campus Director or other staff member if you are on campus or call 911 if you are off campus.
2. Consider securing immediate professional support (e.g.: counseling, victim advocacy, medical services, etc.) to assist you in the crisis.
3. For your safety and well-being, immediate medical attention is encouraged. Further, being examined as soon as possible, ideally within 120 hours, is important in the case of rape or sexual assault. The hospital will arrange for a specific medical examination at no charge. To preserve evidence, it is recommended that you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate or change clothes before receiving medical attention. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care, and evidence may still be recoverable. Typically, if police are involved or will be involved, they will obtain evidence from the scene, and it is best to leave things undisturbed until their arrival. They will gather bedding, linens or unlaundered clothing and any other pertinent articles that may be used for evidence. It is best to allow police to secure items in evidence containers, but if you are involved in transmission of items of evidence, such as to the hospital, secure them in a clean **paper** bag or clean sheet, to avoid contamination. If you have physical injuries, photograph or have them photographed, with a date stamp on the photo. Record the names of

2016 Annual Security Report

any witnesses, and their contact information. This information may be helpful to the proof of a crime, to obtain an order of protection or to offer proof of a campus policy violation. Try to memorize details (physical description, names, license plate number, car description,), or even better, write notes to remind you of details, if you have time and the ability to do so. If you obtain external orders of protection (e.g. restraining orders, injunctions, protection from abuse), please notify the Campus Director or either co-Title IX Coordinator so that those orders can be observed on campus.

4. Even after the immediate crisis has passed, consider seeking support from counseling services, victim advocacy, medical services, and/or the local rape crisis center.
5. Contact the Campus Director if you need assistance with school-related concerns, such as no-contact orders or other protective measures. The Campus Director will also assist in any needed advocacy for students who wish to obtain protective or restraining orders from local authorities. The school is able to offer reasonable academic accommodations, transportation accommodations, escorts, no contact orders, counseling services access and other supports and resources as needed by a victim.

Victims of sex offenses are encouraged to utilize the following off-campus based resources for counseling, mental health, and other services. The institution does not offer any on-campus based counseling or mental health services.

1. Rape, Abuse & Incest National Network (RAINN)
<http://centers.rainn.org/>
National Sexual Assault Hotline: 1-800-656-4673
2. National Center for Victims of Crime
<https://www.victimsofcrime.org/>
1-800-394-2255
3. Pandora's Project - providing information, support and resources to survivors of rape and sexual abuse and their friends and family
<http://www.pandys.org/>
4. Safe Horizon
<http://www.safehorizon.org/page/rape-and-sexual-assault-13.html>
24-hour Crime Victims Hotline: 1-866-689-4357
5. Domestic Violence Hotline: 1-800-799-7233
6. Men's Domestic Abuse Helpline - 1-888-743-5754

Procedures for Addressing Sexual Misconduct and Gender Discrimination

The school treats allegations concerning sexual misconduct, gender-based violence or the crimes of sexual assault, stalking, dating violence or domestic violence very seriously. The school employs interim protection measures such as interim suspension and/or no contact orders in any case where a student's behavior represents a risk of violence, threat, pattern or predation. If a student is accused of sexual misconduct, other gender-based violence or the crimes of rape, sexual assault, sexual harassment, stalking, dating violence or domestic violence, s/he is subject to action in accordance with the Student Code of Conduct in the school's catalog.

Any member of the learning community (students, faculty, or staff) may file a Conduct Violation Form to initiate the process to respond to an alleged violation of the Student Code of Conduct. The individual who files the Conduct Violation Form becomes the complainant. The student being charged with the alleged offense is referred to as the accused. Anyone with knowledge about sexual misconduct or gender-based violence or the crimes of rape, sexual assault, sexual harassment, stalking, dating violence or domestic violence is encouraged to report it immediately.

2016 Annual Security Report

All Code of Conduct Violation Forms are first reviewed by the Director of Education. If the Director of Education determines that sufficient evidence exists to warrant further exploration of the complaint, the next step is for the accused to be scheduled for a Procedural Interview. The accused is sent a copy of the Code of Conduct Violation Form, via email and/or UPS or FedEx, providing a receipt and proof of delivery, which includes a detailed description of the incident, accompanied by a Notification of Violation Letter that indicates the date and time of the procedural interview. The Notification of Violation Letter provides details concerning the student's rights and explains the entire process for resolving the alleged violation.

Procedural Interview

Any student charged with a violation of the Student Code of Conduct will be scheduled for a Procedural Interview with the Director of Education. In those instances where the Director of Education has filed the Code of Conduct Violation Form, the Campus Director should also be present for the Procedural Interview. The accused is sent a Notification of Violation Letter that indicates the date and time of the Procedural Interview, along with a copy of the Conduct Violation Form, describing the alleged violation. The Procedural Interview should be scheduled within five (5) business days of receipt the Code of Conduct Violation Form.

The accused must attend the Procedural Interview. If the accused fails to appear for the scheduled Procedural Interview, **one attempt** will be made to reschedule the meeting. The rescheduled meeting shall occur within ten (10) business days of the receipt of the Code of Conduct Violation Form. If the student again fails to appear for the Procedural Interview, the Director of Education may move forward with the determination of the sanction.

The purpose of the Procedural Interview is to provide the accused with the opportunity to discuss the allegation that resulted in the filing of the Code of Conduct Violation Form. The Director of Education and/or the Campus Director will begin the meeting by delineating the student's rights and options, as well as the potential sanctions that may be imposed for the alleged violation. The accused will have an opportunity to admit or deny the charge made against him/her in the Procedural Interview. The complainant also has the opportunity to attend the Procedural Interview either in person or via conference call.

In the event that the accused admits to the charge filed against him/her, the Director of Education and/or the Campus Director will determine the sanction during the Procedural Interview. The sanction will be notated on a copy of the original Code of Conduct Violation Form. The Code of Conduct Violation Form will then be signed by the Director of Education and/or the Campus Director. The student will be required to sign and date the form as well. The Code of Conduct Violation Form with the original signatures will be placed in the student file; the student will be provided with a copy of the signed form. The Director of Education will enter a notation in Contact Manager within the Student Information Systems.

The accused may deny the alleged violation of the Student Code of Conduct and request a Hearing to further explore the facts concerning the alleged violation. If a hearing is requested, the date and time of the hearing are determined during the Procedural Interview and they are documented on a copy of the original Code of Conduct Violation Form. The student is provided a copy of the updated Code of Code of Conduct Violation Form with this information as well as a copy of the Hearing Guide.

Hearing Procedures

The purpose of a hearing is to provide a forum for the complainant and the accused to present their case regarding the alleged violation of the Student Code of Conduct. The Campus Director serves as the Hearing Authority and will ultimately determine whether or not the alleged violation is proven. Please note that the definition of Hearing Procedures proceeding does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim

2016 Annual Security Report

The Campus Director or otherwise designated Hearing Authority will begin the Hearing by explaining the accused's rights and will assure that fairness will be observed throughout the hearing. Attendees of the hearing are limited to the Campus Director or designee, the complainant and the accused.

The complainant will be given the opportunity to state the main points of the violation, providing evidence supplemented with statements by witnesses. After the complainant concludes his/her presentation, the accused will have the opportunity to state his/her case. The Campus Director or designee may question both the complainant and accused.

After all evidence and testimony has been presented, the Campus Director will determine whether or not the allegation is warranted. If the accused is found not to be in violation, the case will be dismissed and the Code of Conduct Violation Form will be documented accordingly and the student will be provided with a copy.

If the accused is found to be in violation of the Student Code of Conduct, the Campus Director will dismiss the complainant and the accused, indicating that notification of the sanction will be communicated to the student at a specified date and time in the office of the Campus Director.

As the Hearing Authority, the Campus Director or designee will consider the following when determining the sanction to be imposed:

- Statements from witnesses and evidence presented during the hearing;
- Seriousness of the violation;
- Prior disciplinary record of the student;
- Academic record; and
- Student progress against program of study.

Upon reaching a decision, the Campus Director is expected to update the Conduct Violation Form by indicating the sanction that will be imposed as a result of the violation of the Student Code of Conduct. The Campus Director then meets with the student at the predetermined date and time to discuss the sanction and consequences of any repeat violation of the Student Code of Conduct. The student is required to sign the form and is provided a copy. At the same time the student is notified of the outcome of the hearing, a copy of the updated Conduct Violation Form will be provided to the complainant. The Campus Director is expected to make a notation in Contact Manager in the Student Information System and returns the hard copy of the Code of Conduct Violation Form to the student file.

In the event that the Campus Director determines either suspension or expulsion to be the appropriate sanction, the Code of Conduct Violation Form should be completed accordingly and emailed to the Chief Academic Officer and the General Counsel. Upon approval from either the Chief Academic Officer or the General Counsel/Chief Compliance Officer, the Campus Director may proceed with the suspension or expulsion.

Appeals

The accused and/or complainant have the right to request an appeal by notifying the Campus Director or Director of Education of his/her intent to do so within three business days after receipt of the written notification of the sanction. Appeals may be filed for the following reasons:

- Inappropriate sanction; or
- New evidence that was not available at the time of the hearing has become available and is found to be substantial enough to change the outcome of the hearing.

The Appeal Board should be comprised of the Campus Director, Director of Education, and three other members of the administrative staff of the institution. In the event that the complainant is a member of the Appeal Board, that individual will recuse him/herself from the decision-making process. The Appeal Board meets in a closed session, within a reasonable period of time, and either grants or denies the appeal by a

2016 Annual Security Report

majority vote. In the event that there is a tie, due to absence of a member of the Appeal Board, the Campus Director will determine the outcome. In the event that the Campus Director was the complainant, the Director of Education will determine the outcome. If the appeal is granted, the sanction may be changed.

The individual filing the appeal will be notified in writing, utilizing the Code of Conduct Violation Form, of the decision of the Appeal Board within a reasonable period of time. The notification will be emailed and/or sent through the U.S. Postal Service. A hard copy of the form will be placed in the student file and the Director of Education will enter notes in the Contact Manager Field within the Student Information System.

The institution will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph

Sanctions

Enrollment into the institution signifies the student's agreement to comply with the Student Code of Conduct. Failure to comply with the Code of Conduct will result in appropriate disciplinary sanctions.

Disciplinary sanctions are described below.

Verbal Warning

A verbal warning is an official conversation held between the Director of Education, or the Campus Director, and the student, making the student aware of an incidence of unacceptable behavior that is in violation of the Student Code of Conduct. A notation will be entered into the Student Information System but documentation does not become part of the student's permanent record. Any further misconduct may result in more serious disciplinary sanctions up to and including suspension or expulsion.

Written Reprimand

A reprimand is an official written notification of unacceptable behavior that is in violation of the Student Code of Conduct. The reprimand will be entered into the Student Information System and will become a permanent document in the student's file. The student will be asked to sign the document and will be provided a copy of the reprimand. Any further misconduct may result in more serious disciplinary sanctions up to and including suspension or expulsion.

Disciplinary Probation

Disciplinary probation is a conditional status imposed for a designated period of time within a term prohibiting the student from being present without permission on the campus or any property associated with the campus, including internship/externship sites. Disciplinary probation requires completion of a Code of Conduct Violation Form by an instructor and an approval by the Director of Education or Campus Director. Disciplinary probation may be used in those limited instances where a student is asked to leave a class for the duration of the day or day or until the Procedural Interview is conducted. The Procedural Interview should be scheduled within two business days of the incident. A copy of the form should be mailed and/or emailed to the student, indicating when he/she may return to class. The Disciplinary Probation Form becomes a permanent part of the student file and should also be notated in the Student Information System. The student must meet with the Director of Education or Campus Director to sign the form prior to returning to class. Any further misconduct may result in more serious disciplinary sanctions up to and including suspension or expulsion.

Suspension

Suspension is the loss of privileges of enrollment at the institution for a designated period of time and prohibits the student from being present without permission on the property of the campus or any property associated with the campus, including internship/externship/clinical/practicum sites. As a result of being placed on suspension, the student will be awarded a grade of WF for any course in which they are

2016 Annual Security Report

currently enrolled. Regardless of whether or not the student is subsequently allowed to return to school to complete the program of study, the student is responsible for payment of tuition and fees and/or repayment of financial aid. The student shall be notified of the suspension in writing. The notification of suspension indicates the earliest possible date, in a future term, in which the student may consider submission of a request to return to school. The student is entitled to an opportunity to appeal the suspension. The notification of suspension becomes a permanent part of the student record and also must be noted in the Student Information System. Any further misconduct may result in more serious disciplinary sanctions. The Chief Academic Officer or the General Counsel/Chief Compliance Officer of Delta Career Education Corporation must approve suspensions before they are imposed and before a student is notified.

Expulsion

Expulsion is the permanent loss of privilege of enrollment at the institution and prohibits the student from being present without permission on the campus or on any property associated with the campus. The student will be unable to complete his/her program of study with the institution. As a result of being expelled, the student will be awarded a grade of WF for any course in which they are currently enrolled. The student is responsible for payment of tuition and fees and/or repayment of financial aid. The student is entitled to an opportunity to appeal the expulsion. The notification of expulsion becomes a permanent part of the student record and also must be noted in the Student Information System. In the event that a student appeal results in retraction of the expulsion, any further misconduct may result in more serious disciplinary sanctions up to and including suspension or expulsion. The Chief Academic Officer or the General Counsel/Chief Compliance Officer of Delta Career Education Corporation must approve expulsions before they are imposed and before a student is notified.

Re-enrollment after Suspension

Students who have been suspended from the institution must petition to return to school after the specified period of time has elapsed. A Request to Re-enroll After Suspension Form is accessible from the office of the Director of Education. Students who have been suspended must contact the Director of Education for permission to return to the campus or to request that a copy of the form be emailed or mailed. The Petition is submitted to the Director of Education but must be unanimously approved by the Appeal Board. Re-enrollment may be granted but any repeat instance of violation of the Student Code of Conduct will be grounds for permanent dismissal from the institution.

Compliance with the Student Discipline Policy and Procedure provisions does not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C.1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA).

Title-IX Coordinator Notification

When the school receives a report of sexual misconduct, gender-based violence, or other sex or gender discrimination a co-Title IX Coordinator is notified. If the victim wishes to access local community agencies and/or law enforcement for support, the school will assist the victim in making these contacts. The co-Title IX Coordinator will offer assistance to victims in the form of interim or long-term measures such as opportunities for academic accommodations, changes in housing for the victim or the responding student, visa and immigration assistance, changes in working situations and other assistance as may be appropriate and available on campus or in the community (such as no contact orders, campus escorts, transportation assistance, targeted interventions, etc.). If the victim so desires, they will be connected with a counselor on- or off-campus, as well as an on-or off-campus victim's advocate. No victim is required to take advantage of these services and resources, but the school provides them in the hopes of offering help and support without condition or qualification. A summary of rights, options, supports and procedures, in the form of this document, is provided to all victims, whether they are a student, employee, guest or visitor.

When appropriate upon receipt of notice, the co-Title IX Coordinator will cause a prompt, fair and impartial process to be initiated, commencing with an investigation which may lead to the imposition of sanctions, based upon a preponderance of evidence (what is more likely than not), upon a responding student or other accused individual. The Coordinator is ultimately responsible to assure in all cases that

2016 Annual Security Report

the behavior is brought to an end, the school acts to reasonably prevent its recurrence and the effects on the victim and the community are remedied. The Coordinator is also responsible to assure that training is conducted annually for all advocates, investigators, hearing officers, panelists and appeals officers that includes a hearing process that protects the safety of victims and promotes accountability. Training will focus on sexual misconduct, domestic violence, dating violence, sexual assault, stalking, sexual harassment, retaliation and other behaviors that can be forms of sex or gender discrimination covered by Title IX and Clery Act. Training will help those decision-makers in the process to protect the safety of victims and to promote accountability for those who commit offenses.

The investigation and records of the resolution conducted by the school are maintained confidentially. Information is shared internally between administrators who need to know, but a tight circle is kept. Where information must be shared to permit the investigation to move forward, the person bringing the accusation will be informed. Privacy of the records specific to the investigation are maintained in accordance with state law and the federal FERPA statute. Any public release of information to comply with the open crime logs or timely warning provisions of the Clery Act will not release the names of victims or information that could easily lead to a victim's identification. Additionally, the school maintains privacy in relation to any accommodations or protective measures afforded to a victim, except to the extent necessary to provide the accommodations and/or protective measures.

In any complaint of sexual misconduct, sexual assault, stalking, dating violence, domestic violence or other sex or gender-based discrimination covered under the federal law, Title IX, the person bringing the accusation and the responding party are entitled to the same opportunities for a support person or advisor of their choice throughout the process, including any meeting, conference, hearing or other procedural action. Once complete, the parties will be informed, in writing, of the outcome, including the finding, the sanctions (if any) and the rationale therefor. Delivery of this outcome to the parties will occur without undue delay between notifications. All parties will be informed of the school's appeal processes, and their rights to exercise a request for appeal. Should any change in outcome occur prior to finalization, all parties will be timely informed in writing, and will be notified when the results of the resolution process become final.

Sex Offenders

In accordance to the Campus Sex Crimes Prevention Act of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974, the school is providing a link to the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking's states registry directory: <http://www.nsopw.gov/en-US/Registry>. All sex offenders are required to register with the state and to provide notice of each institution of higher education at which the person is employed, carries a vocation or is a student.

In addition to the above notice, all sex offenders are required to deliver written notice of their status as a sex offender to the school no later than three (3) business days prior to their enrollment in, employment with, or volunteering at the school. Such notification may be disseminated by the school to, and for the safety and well-being of, the school community, and may be considered by the school for enrollment and discipline purposes.

Definitions

Rape

Rape is generally defined as 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 definition includes any gender of victim or perpetrator. This definition also includes instances in which the victim is incapable of giving consent because of temporary or permanent mental or physical incapacity (including due to the influence of drugs or alcohol) or because of age. Physical resistance is not required on the part of the victim to demonstrate lack of consent.

2016 Annual Security Report

Many rapes are committed by someone the victim knows, such as a date or friend. Rape can occur under a variety of circumstances, including:

- Where the victim is prevented from resisting due to alcohol or drugs.
- Where the assailant uses physical force or the threat of force to overpower and control the victim.
- Where the victim fears that she or he or another will be injured if the victim does not submit.
- Where the victim is at the time unconscious of the nature of the act, and this is known to the assailant.
- Where the victim is incapable of giving legal consent due to a mental disorder or developmental or physical disability, and this is known or reasonably should be known to the assailant.
- Where the act is accomplished by threatening to use the authority of a public official to incarcerate, arrest, or deport the victim or another person.
- Where the assailant uses duress, such as a direct or implied threat of hardship or retribution, to coerce the victim.
- Where the assailant uses force, fear or threats to accomplish sexual intercourse against the will of the spouse. This provision of the law is known as the "spousal rape law."

Sexual Harassment

Sexual harassment is a form of misconduct that undermines the integrity of the academic environment. It is the policy of the school that sexual harassment is prohibited. All members of the school community, especially officers, faculty and other individuals who exercise supervisory authority, have an obligation to promote an environment that is free of sexual harassment.

Unwelcome sexual advances, requests for sexual favors, and other visual, verbal or physical conduct of a sexual or gender bias nature, constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic status;
- Submission to or rejection of the conduct is used as a basis for academic or employment decisions or evaluations, or permission to participate in an activity; or
- The conduct has the purpose or effect of substantially interfering with an individual's academic or work performance, or of creating an intimidating, hostile or offensive environment in which to work or learn.

Sexual harassment may take many forms-subtle and indirect, or blatant and overt, including but not limited to, the following:

- It may occur between individuals of the opposite sex or of the same sex;
- It may occur between students, between peers and/or co-workers, or between individuals in an unequal power relationship (such as by a supervisor with regard to a supervised employee or an instructor regarding a current student);
- It may be aimed at coercing an individual to participate in an unwanted sexual relationship or it may have the effect of causing an individual to change behavior or work performance;
- It may consist of repeated actions or may even arise from a single incident if sufficiently severe;
- It may also rise to the level of a criminal offense, such as battery or sexual violence.

Sexual violence is a physical act perpetrated against a person's will or where a person is incapable of giving consent due to the victim's use of drugs or alcohol. An individual also may be unable to give consent due to an intellectual or other disability. Sexual violence includes, but is not limited to, rape, sexual assault, sexual battery, and sexual coercion.

Determining what constitutes sexual harassment under this policy is dependent upon the specific facts and the context in which the conduct occurs. Some conduct may be inappropriate, unprofessional, and/or subject to disciplinary action, but would not fall under the definition of sexual harassment. Examples of

2016 Annual Security Report

unwelcome conduct of a sexual or gender related nature that may constitute sexual harassment may, but do not necessarily, include, and are not limited to:

- Rape, sexual assault, sexual battery, sexual coercion or other sexual violence;
- Sexually explicit or gender related statements, comments, questions, jokes, innuendoes, anecdotes, or gestures;
- Other than customary handshakes, uninvited touching, patting, hugging, or purposeful brushing against a person's body or other inappropriate touching of an individual's body;
- Remarks of a sexual nature about a person's clothing or body;
- Use of electronic mail or computer dissemination of sexually oriented, sex-based communications;
- Sexual advances, whether or not they involve physical touching;
- Requests for sexual favors in exchange for actual or promised job or educational benefits, such as favorable reviews, salary increases, promotions, increased benefits, continued employment, grades, favorable assignments, letters of recommendation;
- Displaying sexually suggestive objects, pictures, magazines, cartoons, or screen savers;
- Inquiries, remarks, or discussions about an individual's sexual experiences or activities and other written or oral references to sexual conduct.

Any employee or student bringing a discrimination or sexual harassment complaint or assisting in the investigation of such a complaint will not be adversely affected in terms and conditions of employment and/or academic standing, nor discriminated against, terminated, or expelled because of the complaint. Intentionally providing false information is also grounds for discipline.

Determining what constitutes discrimination under this policy will be accomplished on a case-by-case basis and depends upon the specific facts and the context in which the conduct occurs. Some conduct may be inappropriate, unprofessional, and/or subject to disciplinary action, but would not fall under the definition of discrimination. Individuals who violate this policy are subject to discipline up to and including termination and/or expulsion, in accordance with the school's Student Code of Conduct. Other, lesser sanctions may be imposed, depending on the circumstances.

Stalking

The school defines stalking as engaging in conduct that is directed at a specific person that would cause a reasonable person to experience fear. Stalking may include non-consensual communication, including in-person communication or contact, surveillance, telephone calls, voice messages, text messages, email messages, social networking site postings, instant messages, postings of pictures or information on websites, written letters, gifts or any other undesired communication that elicits fear.

Dating Violence

Dating violence is 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 purpose 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.

Domestic Violence

Domestic violence is a felony or misdemeanor crime of violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;

2016 Annual Security Report

- By 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, or;
- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Fondling

Fondling is 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 of his/her age or because of his/her temporary or permanent mental incapacity.

Incest

Incest is non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape

Statutory rape is non-forcible sexual intercourse with a person who is under the statutory age of consent.

Other Sexual Offenses

Other sexual offenses include the following: sodomy (forced anal intercourse); oral copulation (forced oral-genital contact); rape by a foreign object (forced penetration by a foreign object, including a finger); and sexual battery (the unwanted touching of an intimate part of another person for the purpose of sexual arousal).

Consent

Consent is when someone agrees, gives permission, or says "yes" to sexual activity with other persons. Consent is always freely given and all people in a sexual situation must feel that they are able to say "yes" or "no" or stop the sexual activity at any point. The institution defines consent as a clear and unambiguous agreement, expressed in mutually understandable words or actions, to engage in a particular activity.

Consent doesn't have to be verbal, but verbally agreeing to different sexual activities can help both you and your partner respect each other's boundaries.

When you're engaging in sexual activity, **consent is about communication**. And it should happen every time. Giving consent for one activity, one time, does not mean giving consent for increased or recurring sexual contact. For example, agreeing to kiss someone doesn't give that person permission to remove your clothes. Having sex with someone in the past doesn't give that person permission to have sex with you again in the future.

You can withdraw consent at any point if you feel uncomfortable. It's important to clearly communicate to your partner that you are no longer comfortable with this activity and wish to stop. The best way to ensure both parties are comfortable with any sexual activity is to talk about it.

Emergency and Evacuation Procedures

Upon confirmation of an emergency or dangerous situation the Campus Director is authorized to use emergency communication methods to notify the campus community of an emergency situation that would jeopardize their health and safety.

The institution will test the emergency response and evacuation procedures on at least an annual basis.

In the event of an emergency on campus where evacuation of the facilities is required, the following procedures are recommended:

2016 Annual Security Report

- Identify the location of the emergency. It is essential that students and staff avoid evacuating into the area involved in the emergency.
- Identify the type of emergency, if possible, which will determine the evacuation process and the order of evacuation.
- Identify students and staff that may need assistance in evacuating the premises.
- Students and staff should proceed to designated meeting areas. Instructors should immediately take attendance to ensure everyone assigned to his/her class have evacuated the building and is accounted for.
- Instructors should immediately report any absence(s) of students not at the meeting point, as identified by the local emergency response team, to emergency personnel at the scene or to the Campus Director or the Director of Education.
- Students should not be permitted to leave the meeting area without notifying their instructor of their intention to leave the premises and their destination.
- Reentry of the facility is not permitted unless approved by the Campus Director or the Director of Education after consultation with emergency personnel at the scene.
- In the event of an active shooter in your vicinity, quickly determine the most reasonable way to protect your own life.

Run: Have an escape plan in mind, leave your belongings behind, and keep your hands visible

Hide: Hide in an area out of the active shooter's view and block entry to your hiding place and lock the doors

Fight: As a last resort and only when your life is in imminent danger. Attempt to incapacitate the active shooter. Act with aggression and throw items at the active shooter

Crime Statistics

The following chart reflects the number of crimes committed on campus or immediately adjacent to and accessible from the campus that were reported to a campus security authority or local police agency.

Required Institutional Crime Statistics	2013			2014			2015		
	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
b. Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
c. Sex offenses - Forcible	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
d. Rape	N/A	N/A	N/A	0	0	0	0	0	0
e. Fondling	N/A	N/A	N/A	0	0	0	0	0	0
f. Sex offenses – Non-forcible	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A
e. Incest	0	0	0	0	0	0	0	0	0
f. Statutory Rape	0	0	0	0	0	0	0	0	0
g. Robbery	0	0	0	0	0	0	0	0	0
h. Aggravated Assault	0	0	0	0	0	0	0	0	0
i. Burglary	0	0	0	1	0	0	0	0	0
j. Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
k. Arson	0	0	0	0	0	0	0	0	0

OC=On Campus NC – Non-Campus Property PP=Public Property

2016 Annual Security Report

Of the crimes listed above and for crimes of larceny-theft, simple assault, intimidation, and destruction, damage, or vandalism of property, the following charts reflects the number of these offenses that were reported to a campus security authority or to local police agencies as a crime in which the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. These data are reported according to category of prejudice.

1. Required Institutional Hate Crime Statistics	2015																							
	Race			Religion			Sexual orientation			Gender			Gender Identity			Disability			Ethnicity			National Origin		
	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
b. Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
c. Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
d. Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
e. Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
f. Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
g. Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
h. Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
i. Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
j. Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
k. Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
l. Larceny-Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
m. Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
n. Destruction/Damage or Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

OC=On Campus NC – Non-Campus Property PP=Public Property

1. Required Institutional Hate Crime Statistics	2014																							
	Race			Religion			Sexual orientation			Gender			Gender Identity			Disability			Ethnicity			National Origin		
	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
b. Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
c. Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
d. Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
e. Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
f. Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
g. Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
h. Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
i. Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
j. Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
k. Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
l. Larceny-Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
m. Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
n. Destruction/Damage or Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

OC=On Campus NC – Non-Campus Property PP=Public Property

2016 Annual Security Report

1. Required Institutional Hate Crime Statistics	2013																							
	Race			Religion			Sexual orientation			Gender			Gender Identity			Disability			Ethnicity			National Origin		
	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
b. Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
c. Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
d. Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
e. Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
f. Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
g. Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
h. Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
i. Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
j. Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
k. Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
l. Larceny-Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
m. Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
n. Destruction/Damage or Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

OC=On Campus NC – Non-Campus Property PP=Public Property

The following chart reflects the number of VAWA (Violence Against Women Act) crimes reported to campus security authority or local police agency.

1. VAWA Offenses	2013			2014			2015		
	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Domestic violence	0	0	0	0	0	0	0	0	0
b. Dating violence	0	0	0	0	0	0	0	0	0
c. Stalking	0	0	0	0	0	0	0	0	0

OC=On Campus NC – Non-Campus Property PP=Public Property

The following chart reflects the number of arrests and referrals for campus disciplinary action for drug, liquor, and illegal weapon violations.

1. Required Institutional liquor, drug, and weapon violations	2013			2014			2015		
	OC	NC	PP	OC	NC	PP	OC	NC	PP
a. Arrests for liquor law violations	0	0	0	0	0	0	0	0	0
b. Arrests for drug law violations	0	0	0	0	0	0	0	0	0
c. Arrests for illegal weapon possession	0	0	0	0	0	0	0	0	0
d. Disciplinary action for liquor law violations	0	0	0	0	0	0	0	0	0
e. Disciplinary action for drug law violations	0	0	0	0	0	0	0	0	0
f. Disciplinary action for illegal weapon possession	0	0	0	0	0	0	0	0	0

OC=On Campus NC – Non-Campus Property PP=Public Property

2016 Annual Security Report

The following chart reflects the number crimes that occurred on campus, non-campus property, or public property that were unfounded. The total number of unfounded crimes includes all criminal offenses, hate crimes, arrests or disciplinary action referrals for weapons, drug or liquor law violations, and domestic violence, dating violence, or stalking incidents that have been unfounded.

If a reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is "unfounded". Only sworn or commissioned law enforcement personnel may unfound a crime. Reported crimes that have been deemed unfounded have been withheld from their crime statistics reported above.

	2013	2014	2015
1. Total unfounded crimes	N/A	0	0