

CONSUMER INFORMATION & CAMPUS SECURITY REPORT

American InterContinental University Online
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Consumer Information

Our school distributes a variety of publications that contain information regarding the school and its financial aid programs. If you do not have any of the following information and wish to obtain it, it will be furnished upon request.

- Financial aid programs that are available to students
- How students apply for aid and how eligibility is determined
- Criteria for selecting recipients and determining award amounts
- The rights and responsibilities of students receiving aid
- How and when financial aid will be disbursed among students
- The terms and conditions of any employment that is part of the financial aid package
- The terms of, the schedules for, and the necessity of loan repayment, required loan exit counseling, and conditions under which students may obtain deferments.
- The criteria for measuring satisfactory academic progress, and how a student who has failed to maintain satisfactory progress may reestablish eligibility for federal financial aid
- Regulatory agencies that accredit, approve, or license the school and its programs.
- Costs of attending the school (tuition and fees, books and supplies, room and board, and applicable transportation costs, such as commuting) and any additional costs of the program in which the student is enrolled or has expressed an interest
- The school refund and withdrawal policy and the federal Return of Title IV funds requirements when a student withdraws from school, including the order in which financial aid is refunded
- General information about the school's academic programs, facilities, faculty, and services available to disabled students, including students with intellectual disabilities
- Whom to contact for information on student financial assistance and whom for general school issues
- Information regarding the availability of federal financial aid for study abroad programs
- School policies on transfer of credit, including the criteria it uses regarding the transfer of credit earned at another school, and a list of any schools with which it has established an articulation agreement
- Emergency Response and evacuation procedures to reach students and staff

Family Educational Rights and Privacy Act Notice

The Family Educational Rights and Privacy Act (FERPA) afford eligible students certain rights with respect to their education records. An “eligible student” under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution.

These rights include:

1. The right to inspect and review the student's education records within 45 days after the day the school receives a request for access. A student should obtain an *Authorization for Release of Information* form from the University Registrar Department or Virtual Campus and submit it to the Supervisor of Registrar Services with a written request that identifies the record(s) the student wishes to inspect. The school official will make arrangements for access and notify the student of the time and place where the records may be inspected. Students are not entitled to inspect and review financial records of their parents. If the records are not maintained by the school official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.
2. The right to request an amendment of the student’s education records that the student believes are inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA.

A student who wishes to ask the school to amend a record should write the Supervisor of Registrar Services, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If the school decides not to amend the record as requested, the school will notify the student in writing of the decision and the student’s right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

3. The right to provide written consent before the school discloses personally identifiable information from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

The school discloses education records without a student’s prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the institution in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the board of trustees; or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of the school who performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of the education records, such as an attorney, auditor, or

collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the institution.

- Parental access to a student's record will be allowed by the School without prior consent if: (1) the student has violated a law or the institution's rules or policies governing alcohol or substance abuse, if the student is under 21 years old; or (2) the information is needed to protect the health or safety of the student or other individuals in an emergency.

Upon request, the school also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the School to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-8520

Below is a listing of the disclosures that postsecondary institutions may make without consent:

FERPA permits the disclosure of education records, without consent of the student, if the disclosure meets certain conditions found in the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, FERPA regulations requires the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose education records without obtaining prior written consent of the student in the following instances:

- To other school officials, including teachers, within the school whom the school has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutional services or functions.
- To officials of another school where the student seeks or intends to enroll, or where the student is already enrolled, if the disclosure is for purposes related to the student's enrollment or transfer.

- To authorized representatives of the U. S. Comptroller General, the U. S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is responsible for supervising the institution's State-supported education programs. Disclosures under this provision may be made in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement of compliance activity on their behalf. Disclosures may also be made in connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid.
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction.
- To accrediting organizations to carry out their accrediting functions.
- To comply with a judicial order or lawfully issued subpoena.
- To appropriate officials in connection with a health or safety emergency.
- Information the school has designated as "directory information" may be released at the school's discretion. The School has defined directory information as the student's name, student identification number, address(es), telephone number(s), e-mail address, birth date and place, program(s) undertaken, dates of attendance, honors and awards, photographs and credentials awarded. If a student does not want his or her directory information to be released to third parties without the student's consent, the student must present such a request in writing to the School within 45 days of the student's enrollment or by such later date as the institution may specify. Under no circumstance may the student use this right to opt out to prevent the institution from disclosing that student's name, electronic identifier, or institutional e-mail address in a class in which the student is enrolled.
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding.
- To the general public, the final results of a disciplinary proceeding if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school's rules

or policies with respect to the allegation made against him or her. To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the school governing the use or possession of alcohol or a controlled substance if the school determines the student committed a disciplinary violation and the student is under the age of twenty-one.

Graduation and Placement Rate Information

The school calculates graduation statistics as required by the federal Student Right-to-Know Act. Student outcomes information is posted on the website.

Improvements to Academic Programs

The school reviews its academic programs on a regular basis to ensure relevancy with current employment requirements and market needs. As deemed appropriate, the school may change, amend, alter or modify program offerings and schedules to reflect this feedback. If you have questions about this process, contact the institution's education department.

Copyright Infringement

Students should be aware that the unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, is subject to civil and criminal liabilities. Penalties may include monetary damages, fines and imprisonment. The school prohibits use of its computers and computer networks for the unauthorized downloading and uploading of copyright-protected material, or for maintaining or storing unauthorized copyright-protected material. Disciplinary action, up to and including expulsion from the school, will be taken against students who engage in unauthorized distribution of copyrighted materials using the school's information technology system.

Student Demographic Information

Information about the composition of the students at our school is available on the College Navigator website (www.nces.ed.gov/collegenavigator). College Navigator is maintained by the U.S. Department of Education National Center for Educational Statistics.

To view information about our school, enter our school name into the search tool. Here are a few highlights of information that you will find within the various sections:

- Enrollment: gender and race/ethnicity distribution of students
- Financial Aid: data regarding the various financial aid sources for students, including federal grants (Pell and SEOG)
- Retention/Graduation Rate: Retention rate of certificate- or degree-seeking, first-time, full-time, undergraduate students

The Career Services Department serves as a liaison between students and employers, serving the students by promoting the School to prospective employers. For additional information regarding career and placement services offered to students during and after enrollment, contact the Career Services Department staff.

Protection of Student Speech and Association Rights

Students should be treated equally and fairly. The school facilitates free and open exchange of ideas. Students should not be intimidated, harassed, discouraged from speaking out or discriminated against.

Vaccinations

Good health practices are encouraged for all students. However, the school does not require any specific vaccinations beyond those required by state and other laws as a condition for admission. Some programs may have specific requirements. Review the admissions requirements section of the catalog to determine whether this impacts the student's particular program. Students are encouraged to consult with their health care professional to discuss obtaining or updating vaccinations.

Voter Registration Information

As part of the requirement for our institution to participate in the Federal Student Aid programs, we are required by federal law to provide each student with the state's voter registration form in paper or by an electronic method. In order to register to vote, please visit http://www.eac.gov/voter_resources/contact_your_state.aspx. Find and select your state to view eligibility requirements, registration deadlines, and a link to visit your state election department web page and obtain your state's voter registration form. If you have any questions, please contact the Financial Aid Office.

Treatment of Federal Student Aid-Title IV-When a Student Withdraws-Requirements of 34 CFR 668.22

The laws and regulations are very specific about how the school must determine the amount of federal student aid (Title IV) program assistance you have earned and may retain if you withdraw from school. The Title IV programs that are covered include: Federal Pell Grants, Iraq Afghanistan Service Grants, Federal Direct Stafford Loans, Federal Direct PLUS Loans, Federal Supplemental Educational Opportunity Grants, and, at CTU only, Federal Perkins Loans.

When you withdraw during your payment period or period of enrollment, your school can define these for you and tell you which one applies to you, if you received (or your school or parent received on your behalf) less aid than you earned (based on the federal formula), you may be able to receive those additional funds. If you received more aid

than you earned, then the excess amount must be returned to the aid program (by the school and/or by you).

The amount of assistance that you have earned is determined by a federal formula to calculate the prorata percentage of the payment period completed prior to withdrawing. For example; if you completed 30% of your payment period or period of enrollment, then you earn 30% of the aid you were originally scheduled to receive. However, once you have completed more than 60% of the payment period or period of enrollment, you are considered to have earned all the assistance that you were scheduled to receive for that period.

If you did not receive all of the funds that you earned, then you may be due a post-withdrawal disbursement. If your post-withdrawal disbursement includes Federal Direct Loan funds, then the school must contact you and explain your obligation to repay the loans, if disbursed, and get your permission before the loan funds can be disbursed to you. You may choose to decline some or all of the loan funds so that you don't incur additional debt. Your school may automatically apply all or a portion of your post-withdrawal disbursement of grant aid funds to outstanding tuition, fees, books and supplies (if billed separately by the school) and room and board charges (if contracted with the school). However, the school needs your permission to use the post-withdrawal grant aid disbursement for all other non-education related school charges. If you do not give your permission for the school to apply aid funds to other education related charges (some schools ask for this authorization when you enroll), then you will be offered the funds. However, it may be in your best interest to give permission to allow the school to apply aid funds to other incurred charges in order to reduce your debt at the school.

There may be some Title IV funds that you were scheduled to receive but which cannot be disbursed to you once you withdraw because of other Title IV eligibility requirements. For example, if you are a first-time, first-year undergraduate student and you have not completed the first 30 days of your program before you withdraw, you will not be eligible to receive any Federal Direct Stafford Loan funds that you would have received had you remained enrolled past the 30th day.

If you receive (or your school or parents receive on your behalf) excess Title IV program funds that must be returned, the return must be a portion of the excess equal to the lesser of:

1. your institutional charges multiplied by the unearned percentage of your funds,
or
2. the entire amount of excess funds.

The return of funds is required even if the school didn't retain this amount of your aid funds.

If your school is not required to return all of the excess funds (e.g., some of excess aid was money that was provided directly to you as a stipend), then you must return the remaining amount.

- Any Federal Direct Loan funds that must be returned is accomplished as you (or your parent for a Federal Direct Parent-PLUS Loan) repay the loan in accordance with the terms of the promissory note. That is, you make scheduled payments to the holder of the loan over a period of time.
- Any amount of unearned grant aid funds that you must return is called an overpayment. The maximum amount of a grant overpayment that must repaid is limited to the amount by which the original grant overpayment amount exceeds one-half of the total grant funds you received or were scheduled to receive. A student does not have to repay a grant overpayment of \$50 or less. If you are required to return unearned grant aid funds, you must make arrangements with your school, or the Department of Education to return these funds.

If the school returns federal student aid (Title IV) funds on your behalf (e.g., some of excess aid was money that was provided directly to you as a stipend), then your school may also pass that charge on to you for any Title IV program funds that they were required to return.

The requirements for Title IV program funds when you withdraw are separate from any tuition refund policy that your school may have. Therefore, you may still owe funds to the school to cover unpaid institutional charges. If you don't already know what your school's refund policy is, you can ask your school for a copy. Your school can also provide you with the requirements and procedures for officially withdrawing from school.

If you have questions about your federal student (Title IV) aid program funds, you can call the Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243). TTY users may call 1-800-730-8913. Information on Student Aid is also available at www.studentaid.ed.gov.

Drug and Alcohol Abuse Prevention Information

In accordance with the requirements of the Drug-Free Schools and Communities Act of 1989 (Public Law 101-226), and the Drug-Free Workplace Act of 1988 (Public Law 101-690), our school provides all students and employees with the following information concerning school policies and the consequences of the manufacture, distribution, possession, or use of illicit drugs or alcohol.

Students and employees are prohibited from unlawfully manufacturing, distributing, possessing, or using illicit drugs or alcohol while on school property or participating in any school activity. Violation of this policy will subject students or employees to disciplinary action up to and including expulsion or termination from employment. In addition, violation may result in local, state, and/or federal criminal charges.

Legal sanctions under local, state, and federal laws may include:

- suspension, revocation, or denial of a driver's license
- loss of eligibility for federal financial aid or other federal benefits
- property seizure
- mandated community service
- felony conviction that may result in 20-50 years imprisonment at hard labor without benefit of parole
- monetary fines

In addition to local and state authorities, the federal government has four agencies (the Drug Enforcement Agency, U.S. Customs Service, Federal Bureau of Investigation, and the U.S. Coast Guard) engaged in combating illicit drugs. One should be aware that:

- it is a crime to hold someone else's illicit drugs
- it is a crime to sell fake "dope"
- it is a crime for being in a house where people are using illicit drugs, even if you are not using them
- it is a crime if drugs are in your locker, car, purse, or house which is considered "constructive possession"

Drug abuse, which can affect one's physical and emotional health and social life, is the utilization of natural and/or synthetic chemical substances for non-medical reasons to affect the body and its processes, the mind and nervous system, and behavior. Drugs can be highly addictive and injurious to the body. Among the manifestations may be loss of sense of responsibility and coordination, restlessness, irritability, anxiety, paranoia, depression, acting slow-moving, inattentiveness, loss of appetite, sexual indifference, coma, convulsions, and death.

There are classic warning signs that could be indicative of drug use. These signs include:

- Unexplained change in personality or attitude
- Drop in attendance and performance at work or school
- Deterioration of physical appearance, personal grooming habits
- Sudden mood swings, irritability, or angry outbursts
- Unexplained need for money or financial problems. May borrow or steal to get it
- Engaging in secretive or suspicious behaviors
- Sudden change in friends, favorite hangouts, and hobbies

Information regarding the effects of commonly abused drugs may be found on the internet at www.nida.nih.gov/DrugsofAbuse.html .

Drug and alcohol abuse education programs are offered by local community agencies. The school will post information about such education programs at the Student Affairs Department.

While care must be taken to ensure that a person is not wrongly accused of drug use, it is recommended that anyone who notes warning signs in either a student or employee contact the school President's Office or Campus Director's Office. If it is determined by the school President or Campus Director that a student or employee is in need of assistance to overcome a drug problem, he/she may be counseled on the need to seek assistance. The cost of such assistance or treatment will be the responsibility of the student or employee. Records of such counseling will remain confidential.

In certain instances, students and employees may be referred to counseling and/or a substance abuse help center. If such a referral is made, continued enrollment or employment is contingent upon attendance and successful completion of any prescribed counseling or treatment. Students or employees who are seeking treatment for a substance abuse problem may contact the President's Office. Confidentiality will be maintained. In addition, students or employees who believe they have a substance abuse problem may find sources of treatment or advice by referring to the section of the local telephone book headed "Drug Abuse & Addiction Information and Treatment."

There are also national organizations that may be contacted for help, such as:

- The Alcoholism and Drug Abuse Hotline 1-800-ALCOHOL (1-800-252-6465)
- National Drug Abuse Helpline 1-866-874-4553
- The National Institute on Drug Abuse Treatment Referral Hotline 1-800-662-HELP (4357) or <http://findtreatment.samhsa.gov/>
- Al-Anon for Families of Alcoholics 1-800-344-2666

Student and employees must notify the school President, in writing, within five days of being convicted of a criminal drug statute at the school. Disciplinary action will occur within 30 days of receipt of the written notification and may range from a letter of admonishment to termination from enrollment or employment at the school.

Campus Security and Crime Prevention Information

The school prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) and Violence Against Women Act (VAWA). This report is prepared in cooperation with local law enforcement agencies. Campus crime, arrest and referral statistics include those that were reported to local law enforcement and campus faculty and staff. Nothing in the law shall be construed to permit a school to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual with respect to the implementation of the Clery Act.

Our school attempts to provide students and employees with a safe and secure environment in which to study and work. The Virtual Campus is available to students 24/7.

Personal Safety

While the school attempts to provide a safe and secure environment, students, faculty, staff, and campus visitors are ultimately responsible for their safety. Safety is enhanced when students and employees take precautions such as:

- Report all suspicious activity to Campus Security Authorities (CSA) immediately. CSA include school security staff, faculty, and administrative staff.
- Never take personal safety for granted.
- Avoid walking alone at night. Travel with a friend or companion.
- Avoid parking or walking in secluded or dimly lit areas.
- Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively.
- Carry only small amounts of cash.
- Never leave valuables (wallets, purses, books, computers, etc.) unattended.
- Carry your keys with you at all times and don't lend them to anyone.
- Lock your car doors and close the windows when leaving your car.
- Never leave valuables in your car especially if they are easily noticeable.
- Inventory your personal property and make records of the serial numbers of all items of value.
- Never admit anyone without a valid ID badge on campus/school premises.

As the school becomes aware of relevant programs that address responsible practices and procedures that enhance personal safety, such information may be obtained on-campus at the Student Affairs Department.

Reporting a Crime

If a student or employee is aware that a crime has been, or is being, committed on school property or at a school sponsored or recognized event off-campus during the hours that the school is open, the crime should be reported as soon as possible to the President's Office, Campus Director's Office, or any Campus Security Authority (CSA),

which include school security staff, faculty, and administrative staff, when the victim of a crime elects to or is unable (physically/mentally) to make such a report. The President's Office or Campus Director's Office can be reached by contacting the University Ombudsman.

Other emergencies should also be reported to the President's Office or Campus Director's Office. Regular business hours for the school are 8am to 5pm, Monday-Friday. If the crime has been committed after regular business hours, it should be reported to the front desk, CSA, or security guard. If the crime has been committed when the school is closed, it should be reported to the President's Office, Campus Director's Office, or CSA as soon as possible after school is open. In addition to reporting the crime to the President's Office or Campus Director's Office, the crime should be reported to local law enforcement authorities.

The school does not have a campus police or security department. The school works with local law enforcement agencies and refers criminal incidents to the local police department having jurisdiction over such matters. The school does not have a written memorandum of understanding (MOU) with state or local law enforcement agencies to investigate alleged criminal offenses.

Certain institutional employees are designated as a CSA. The CSA may include any official of the institution who has significant responsibility for student and campus activities and who has the authority and duty to take action and respond to particular issues on behalf of the institution.

The CSA will work with local law enforcement, as appropriate, when a crime is reported. Crimes reported to the CSA are included in the annual campus crime statistics. In addition, the school requests from the local Police Department crime information not reported to the school President's Office or Campus Director's Office that is appropriate for inclusion in the annual campus crime statistics. Further, if circumstances warrant, the school community will be notified if an on-going threat is posed related to a reported crime.

If you are the victim of a crime and do not want to pursue action through the school or the criminal justice system, you may still consider making a confidential report. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. Reports filed in this manner are included in the annual crime statistics for the school.

The school does not tolerate violence or other threatening conduct against any members of the school community. This includes criminal acts against persons or property, as

well as harassment based on sex, race, ethnicity, or disability. The school will impose strict disciplinary actions and appropriately involve law enforcement officials should any acts of violence or threatening conduct occur on school facilities or at school-sponsored events. This includes acts of violence against women.

In addition to any criminal sanctions, the school will impose appropriate disciplinary sanctions if the offender is a student or employee of the school. The President's Office or Campus Director's Office should be contacted should one wish to file a complaint. Also, note that, in cases of sexual assault complaints:

- both the accuser and the accused are entitled to the same opportunities to have others present during the disciplinary hearing and
- both the accuser and the accused shall be informed of the outcome of any disciplinary proceeding based on an allegation of sexual assault.

The school will work with the victim, should it be requested, in making such changes as can reasonably be accommodated relative to the student's academic and living situations. Detailed information is provided in the *Sexual Assault Policy and Prevention* section of this document.

Emergency Response and Evacuation Procedures

If an on-going threat is posed related to a reported crime, a campus safety alert will be issued in a timely manner to the school community via the school emergency notification system. Campus safety alerts can be distributed in various ways, as deemed appropriate for the situation. Most commonly, upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff, an announcement will be sent to the school community in multi-modal format (E-mail, Voice Mail, Text, Short Message Service) with information and instructions.

Registered Sex Offenders

The Jacob Wetterling Act requires states to obtain information concerning registered sex offenders' enrollment or employment at institutions of higher education. Those seeking to obtain information about registered sex offenders should visit the following website: www.nsopr.gov. Further, to the extent the State notifies an educational institution of information concerning registered sex offenders, the Family Educational Rights and Privacy Act (FERPA) does not prevent educational institutions from disclosing such information.

Crime Statistics for our School for the Past Three Years

The following criminal offenses occurred during the calendar years listed.

| CRIMINAL OFFENSES | ON CAMPUS | | | NON-CAMPUS | | | PUBLIC PROPERTY | | | STUDENT HOUSING FACILITIES | | |
|-----------------------------------|-----------|------|------|------------|------|------|-----------------|------|------|----------------------------|------|------|
| | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 |
| Murder/Non-negligent Manslaughter | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Negligent Manslaughter | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Sex Offenses: | | | | | | | | | | | | |
| Rape | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Fondling | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Statutory Rape | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Incest | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Robbery | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Aggravated Assault | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Burglary | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Motor Vehicle Theft | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Arson | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A |
| Domestic Violence | 0 | 0 | N/A | N/A | N/A | N/A | 0 | 0 | N/A | N/A | N/A | N/A |
| Dating Violence | 0 | 0 | N/A | N/A | N/A | N/A | 0 | 0 | N/A | N/A | N/A | N/A |
| Stalking | 0 | 0 | N/A | N/A | N/A | N/A | 0 | 0 | N/A | N/A | N/A | N/A |

| VIOLATIONS | ON CAMPUS | | | NON-CAMPUS | | | PUBLIC PROPERTY | | | STUDENT HOUSING FACILITIES | | | Referred for campus disciplinary action (Y or N) |
|--------------------------------------|-----------|------|------|------------|------|------|-----------------|------|------|----------------------------|------|------|--------------------------------------------------|
| | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 | 2014 | 2013 | 2012 | |
| Liquor law violations | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A | N |
| Drug law violations | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A | N |
| Illegal weapons possession violation | 0 | 0 | 0 | N/A | N/A | N/A | 0 | 0 | 0 | N/A | N/A | N/A | N |

Hate Crimes

Hate crimes are those crimes that manifest evidence that the victim was intentionally selected because of the perpetrator's bias. The categories of bias include the victim's actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin and disability.

The school reports all hate crime statistics separately for the categories of criminal offenses listed in the chart above. Additionally, hate crimes statistics are also reported separately for the following offenses: larceny-theft, simple assault, intimidation and destruction/damage/vandalism of property.

There were no reported hate crimes for the years 2012, 2013, or 2014.

Student Housing Facilities:

Our school does not maintain school-operated student housing facilities.

Fire Safety Reporting:

Our school does not maintain school-operated student housing facilities, and is not required to maintain a log of all fire related incidents.

Missing Persons:

Our school does not maintain school-operated student housing facilities, and is not required to publish a missing student notification policy. However, students are encouraged to contact the local police if they have information about a missing person.

Unfounded Crimes

Unfounded crimes are those crimes that are removed or withheld from the annual security report after it has been determined that the reported crime was false or baseless. Only sworn commissioned law enforcement personnel can make a formal determination that the report was false or baseless when made and that the crime report was therefore “unfounded.” This does not include a district attorney who is sworn or commissioned, nor does it include a Campus Security Authority.

There were no reported crimes for the years 2012, 2013, or 2014 that are determined to have been unfounded.

Sexual Assault Policy and Prevention

Our school is committed to creating and maintaining a community in which students, faculty and staff work in an environment free from all forms of harassment, exploitation, intimidation or violence. Prohibited conduct includes all forms of sexual discrimination and sexual harassment, as well as sexual assault and sexual violence. Domestic violence, dating violence, and stalking are also prohibited by this policy. These are serious offenses that may result in suspension, required withdrawal, expulsion, or termination of employment.

In the event of sexual assault, dating violence, domestic violence or stalking, victims are encouraged to report offenses in a timely manner to the President's Office, Campus Director's Office, any Campus Security Authority (CSA) and/or the Title IX Coordinator.

Victims are encouraged to exercise their rights, if desired, including:

- Proceeding to a place where it is safe from further attack and reporting offenses to proper local law enforcement, campus security authority, and health officials
- Preserving any evidence of the assault that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order (do not drink, bathe, change clothing, or comb hair, as this may destroy evidence that may be needed to prosecute the offender)
- Obtaining immediate medical attention
- Receiving appropriate counseling referral information
- Receiving information on services for health, victim advocacy, legal assistance, visa and immigration assistance, and student financial aid
- Completing crime reports
- Changing academic and work situations (e.g., student's course schedule; employee's work environment.
- Applying for judicial no-contact, restraining and protective orders.
- Receiving as the right of both the accuser and the accused the outcome of any institutional disciplinary proceeding that is brought alleging a sex offense. If the alleged victim is deceased as a result of the crime or offense, the institution must provide results of the disciplinary hearing to the victim's next of kin, if so requested.

The school strongly advocates that a victim of sexual assault, dating violence, domestic violence or stalking report the incident in a timely manner. Victims may report a sexual assault, or incidents of dating violence, domestic violence and stalking to the President's Office, Campus Director's Office, or to any CSA. Victims of sexual assault, dating violence, domestic violence and stalking also have the option of notifying proper local law enforcement. If requested by the victim, the school will assist the student in notifying law enforcement. The victim also has the option to decline notifying authorities.

In addition, the school President's Office or Campus Director's Office will provide information on off-campus agencies that provide services to victims of a sex offense. National organizations that provide services to victims of sex offenses include:

- **National Sexual Violence Resource Center**
877-739-3895 (toll-free) or visit their website at <http://www.nsvrc.org>
- **Rape, Abuse and Incest National Network (RAINN) National Sexual Assault Hotline** (800) 656-HOPE (4613) or visit their website at <http://www.rainn.org>
- **The National Center for Victims of Crime**
Toll-free: 1-800-FYI-CALL (1-800-394-2255) or visit their website at www.ncvc.org

The School will (a) provide complainants with information about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the School and in the community; (b) provide complainants with information about their options for, and available assistance in, changing academic, living, transportation and working situations if requested and reasonably available, regardless of whether the complainant chooses to report the offense to campus security or to local law enforcement; and (c) facilitate changes in the complainant's transportation and working situations, in addition to academic and living situations, if requested and reasonably available.

If a victim informs the institution that they have an orders of protection, no-contact orders, restraining orders or similar lawful orders issued for a criminal, civil or tribal court in effect, the institution will uphold the conditions of the order to the best of its ability.

The institution will protect the confidentiality of victims. Publicly available recordkeeping, such as mandatory Clery reporting, will be accomplished without the inclusion of identifying information, to the extent permitted by law.

Definitions:

Please note that these are generally accepted definitions which may be superseded by more restrictive definitions in your local jurisdiction.

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.

Dating Violence:

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

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

Domestic Violence:

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;
- 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;
- 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.

Stalking:

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to

- Fear for the person's safety or the safety of others; or
- Suffer substantial emotional distress.

For the purposes of this definition:

- Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action,

method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Sexual Assault: An offense that meets the definition of rape, fondling incest or statutory rape as used in the FBI's UCR program.

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

Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

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

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

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

Disciplinary Proceedings

The school has disciplinary procedures in place to address allegations of dating violence, domestic violence, sexual assault, or stalking, which are detailed in the catalog. Under these procedures, when a student or employee reports to the institution that they have been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, the institution will provide a written explanation of the student's or employee's rights and options.

The School is committed to undertaking prompt, thorough, impartial and fair investigations, and to treating all individuals with respect and sensitivity. Depending upon the nature of the alleged or suspected policy violation, the relevant official (or his

or her designee) will conduct an investigation either alone or with one or more other school officials as deemed appropriate by the school.

The investigation of any suspected or alleged violation of this policy will be completed within 60 calendar days of the filing of a complaint or the date on which the school becomes aware of a suspected violation of this policy unless the school determines in its discretion that good cause exists to extend the time to complete the investigation, in which case the parties will be notified and provided with an explanation of the reason for the extension of the 60-day period. The nature and extent of the investigation will vary depending upon the circumstances, including whether the parties are amendable to pursuing an informal resolution (and the matter is eligible for informal resolution, as discussed below). As part of the investigation, the relevant official (or his or her designee) will seek to interview the complainant and the accused. To help ensure a prompt and thorough investigation, complainants are asked to provide as much information as possible:

- The name, department, and position of the person or persons allegedly causing the dating violence, domestic violence, sexual assault, or stalking.
- A description of any relevant incident(s), including the date(s), location(s), and the presence of any witnesses.
- The alleged effect of the incident(s) on the complainant's opportunity to benefit from the school's programs or activities.
- The names of other individuals who might have been subject to the same or similar acts of dating violence, domestic violence, sexual assault, or stalking.
- Although it is not required, any steps the complainant has taken to try to stop the dating violence, domestic violence, sexual assault, or stalking.
- Any other information the complainant believes to be relevant to the alleged dating violence, domestic violence, sexual assault, or stalking.

Any accused parties are also expected to provide as much information as possible in connection with the investigation.

The School reserves the right to suspend any member of the school community suspected or accused of violating this policy or to take any other interim measures the school deems appropriate, pending the outcome of an investigation or grievance. Such interim measures can include, but are not limited to, removing a student from campus housing, modifying course schedules, and issuing a "no contact" order.

In situations involving suspected or alleged violations of this policy the School also reserves the right to take steps to protect the complainant as deemed necessary during the pendency of the investigation and resolution process (e.g., allowing for a change in academic situation, issuing a "no contact" order to the accused, etc.). Any such interim steps will be taken in a manner that minimizes the burden on the complainant to the

extent possible. Interim measures will be kept confidential to the extent that maintaining such confidentiality would not impair the ability of the School to provide the interim measures.

Informal Resolution Process

Allegations of sexual assault, dating violence, domestic violence or stalking may not be resolved using an informal resolution process (i.e., mediation). However, other alleged violations of this policy, including some allegations of sexual harassment, may be resolved using an informal resolution process overseen by one or more school representatives if (i) the School determines, in its discretion, that such a process would be appropriate; and (ii) all parties agree to participate.

The parties to any such informal process will not be required to deal directly with one another without the School's involvement. Instead, one or more school representatives may arrange for or facilitate mediation between the involved parties and coordinate other informal resolution measures. Any party may request that the informal resolution process be terminated at any time, in which case the formal resolution process (described below) would commence. In addition, any party can pursue formal resolution if he or she is dissatisfied with a proposed informal resolution.

Formal Resolution Process

The formal resolution process applies (i) when any party so requests in connection with a matter that is eligible for informal resolution; and (ii) to all matters that are not eligible for informal resolution (i.e., matters involving alleged or suspected sexual assault, dating violence, domestic violence or stalking). The School may also elect to use the formal resolution process in any matter when the School deems it appropriate. As part of the formal resolution process, the school may determine that further steps are required to complete the school's investigation. The following procedural protections apply to matters that are not resolved using the Informal Resolution Process described above:

- *Investigator Qualifications.* The official(s) designated to conduct the investigation shall be trained in the investigation of, and other issues related to, sexual assault, domestic violence, dating violence, stalking and other misconduct covered by this Policy, shall not have a conflict of interest or bias for or against any parties involved in the potential Policy violation, and shall have received at least annual training on issues related to these issues.
- *Standard for Determining Responsibility.* The standard used to determine whether this policy has been violated is whether it is more likely than not that the accused violated this policy. This is often referred to as a "preponderance of the evidence" standard.

- *Rights of Complainants and Accused Parties; Timing of Resolution.* The School shall provide any individual suspected or accused of violating this policy with a written explanation of the suspected or alleged violations of this policy. Complainants and accused parties shall both be provided with the following in connection with the resolution of suspected or alleged violations of this policy.
 - o The opportunity to speak on their own behalf.
 - o The opportunity to identify witnesses who can provide information about the alleged conduct at issue.
 - o The opportunity to submit other evidence on their behalf.
 - o The opportunity to be accompanied to any meeting or proceeding related to the School's resolution of an alleged or suspected violation of this policy by an advisor of their choice.
 - o The opportunity to review any information that will be offered by the other party in support of the other party's position (to the greatest extent possible and consistent with FERPA or other applicable law), as well as timely and equal access to any other information that will be used during any informal or formal disciplinary proceedings.
 - o The right to be informed of the outcome of the investigation (to the greatest extent possible and consistent with FERPA or other applicable law).
 - o The opportunity to appeal the outcome of the investigation.

- *Sanctions; Corrective Actions.* The official conducting the investigation will determine whether a violation of this policy has occurred and what, if any, corrective action is appropriate. The school will take reasonable steps to prevent the recurrence of any violations of this policy and to correct the discriminatory effects on the complainant (and others, if appropriate).

The range of potential sanctions/corrective actions that may be imposed against a student includes the following: written or verbal apology, sexual assault, dating violence, domestic violence or stalking prevention education, verbal or written warning, probation, suspension, and dismissal from the school. Employees who are found to have violated this policy may be terminated or subjected to other disciplinary action in accordance with the Code of Business Conduct & Ethics. Guests and other third parties who are found to have violated this policy are subject to corrective action deemed appropriate by the School, which may include removal from the School and termination of any applicable contractual or other arrangements.

In instances where the School is unable to take disciplinary or other corrective action in response to a violation of this policy because a complainant insists on

confidentiality or for some other reason, the School will nonetheless pursue other steps to limit the effects of the conduct at issue and prevent its recurrence.

- *Notification of Outcome.* After the conclusion of the investigation, the school will provide written notification to the complainant and the accused of the outcome (i.e., whether a violation of this policy has occurred), including the rationale for the outcome and explanation of the School's appeal procedures, within seven (7) calendar days after the conclusion of any hearing or proceeding unless the school determines that additional time is required. This notice shall be issued simultaneously to both parties to the extent practicable.

The school may also disclose to the complainant information about any sanctions or corrective actions taken that relate directly to the complainant (e.g., a "no contact" order). The school will maintain documentation of all hearings or other proceedings, which can take various forms (e.g., notes, written findings of fact, transcripts, or audio recordings, etc.).

Under no circumstances will the complainant be required to abide by a nondisclosure agreement that would prevent disclosure of the outcome.

- *Right to Appeal.* Once written notification of the resolution has been provided, either the complainant or the accused will have the opportunity to appeal the outcome (including the issue of whether there is a policy violation and any sanction(s) imposed). Any appeal must be submitted in writing to the Lead Title IX Coordinator ("Coordinator") within seven (7) calendar days of being notified of the outcome and must set forth the grounds upon which the appeal is based.

If the Coordinator is unable to resolve the appeal for any reason, the School will designate another representative to decide the appeal. Neither party shall be entitled to a hearing in connection with any appeal, but the Coordinator (or designee) may request written submissions from the parties or consider any other information as deemed appropriate by the Coordinator (or designee). Both parties will be informed in writing of the outcome of any appeal within fourteen (14) days of the date by which all requested information is received unless the Coordinator (or designee) determines that additional time is required. This notice shall be issued simultaneously to both parties to the extent practicable. Appeal decisions by the Coordinator (or designee) are final.

Prohibition Against Retaliation

No individual who makes a complaint alleging a violation of this policy or who participates in the investigation or resolution of such a complaint shall be subject to retaliation, intimidation, coercion, threats or discriminatory action as a result of such

activity or participation. Retaliation exists when action is taken against a complainant or participant in the complaint process that (i) adversely affects the individual's opportunity to benefit from the school's programs or activities; and (ii) is motivated in whole or in part by the individual's participation in the complaint process. Any acts of retaliation, as defined above, shall be grounds for disciplinary action, up to and including dismissal for students and termination of employment for faculty and staff.

Confidentiality

To the extent permitted by law, the confidentiality of all parties involved in the resolution of alleged or suspected violations of this policy will be observed, provided that it does not interfere with the School's ability to conduct an investigation and take any corrective action deemed appropriate by the School and/or its schools. Identifying information regarding complainants will not be included in any timely warnings or other publicly available records.

Fabricated Allegations

Any allegations suspected to be fabricated for the purpose of harassing the accused party or disrupting the school's operations are subject to these investigation and grievance procedures and could result in disciplinary action, up to and including dismissal for students and termination of employment for faculty and staff.

Prevention and Awareness Programs

The School will provide primary prevention and awareness programs for all incoming students and new employees that address topics including definitions, risk reduction, bystander intervention, reporting and investigation procedures, and sanctions as described within this document. The School will also provide ongoing prevention and awareness campaigns for students and employees that include this same information.

Reducing Risk

General crime prevention strategies can help reduce the risk of falling victim to sexual related crimes (see the Personal Safety section earlier in this document). In addition, recognizing the warning signs of abusive behavior can serve as a deterrent to sexual related crimes. The following is an example of behaviors seen in people who abuse their partners. If someone exhibits more than three of any of these warning signs, there is a strong potential for abuse in the relationship. An abuser may exhibit only a few of these behaviors, but they may be quite exaggerated.

- Past abuse
- Threats of violence or abuse
- Breaking objects
- Use of force during an argument
- Jealousy

- Controlling behavior
- Quick involvement
- Unrealistic expectations
- Isolation
- Blames others for problems
- Blames others for their feelings
- Hypersensitivity
- Cruelty to animals or children
- Jekyll-and-Hyde personality

Bystander Intervention

An engaged bystander is someone who intervenes in a safe and positive way before, during, or after a situation or event in which they see or hear behaviors that promote dating violence, domestic violence, sexual assault, or stalking. The bystander approach attempts to teach community members how to be engaged bystanders in a safe and effective way.

Primary prevention activities take place before violence happens to prevent perpetration or victimization.

If you see someone in danger of being assaulted:

- Step in and offer assistance. Ask if the person needs help. Before stepping in, make sure to evaluate the risk. If it means putting yourself in danger, call 9-1-1 instead.
- Don't leave. If you remain at the scene and are a witness, the perpetrator is less likely to do anything.
- If you know the perpetrator, tell the person you do not approve of their actions. Ask the person to leave the potential victim alone.