Campus Crime and Security Policy

I. SCOPE

This policy applies to all members of the North American Trade Schools community and to the public.

II. POLICY

North American Trade Schools (NATS) is dedicated to providing a safe and welcoming environment for all students, faculty and staff by performing a regular evaluation of its security programs while monitoring, responding, and reporting any issues at the institution.

NATS is committed to comply with its obligations under the Jean Clery Disclosure of Campus Security Policy and Crime Statistics Act, and the Higher Education Opportunity Act of 2008 to report all Clery Act Crimes, to disclose crime statistics, to provide campus safety and security policy statements, and to notify the campus community regarding Clery Act Crimes and other serious incidents.

NATS has established a Campus Security Committee to meet annually to review Clery Act compliance efforts. The Campus Director will appoint the organization's Security Compliance Officer. The Security Compliance Officer shall work with the Campus Security Committee to develop and implement policies and procedures regarding the campus's Clery Act obligations. The current Security Compliance Officer is Matt Daly.

Definitions

Campus Security Committee: A committee comprised of campus officials selected by the Campus Director who meet to review NATS's Clery Act compliance efforts and make recommendations to the Security Compliance Officer regarding NATS's Clery Act obligations.

Campus Security Authority ("CSA"): Groups of individuals specified in the Clery Act and associated with the campus, including:

- Any individual or organization specified in the campus safety and security policy statements as an individual or organization to which students and employees should report criminal offenses; and
- Any official of the campus who has significant responsibility for student and campus activities, including, but not limited to, student discipline and campus judicial proceedings, and who has the authority and the duty to take action or respond to a particular issue on behalf of NATS and the campus.
- NATS is a non-residential school, and does not have an on-campus police force.

Therefore, all crimes should be reported to local law enforcement.

- At NATS, CSAs include the following individuals:
    - Matt Mann
    - Joanne Debole
    - Matt Daly
    - Chris Raver

Clery Act Crimes: Certain crimes specified in the Clery Act on which NATS must compile statistics of reports made to the CSAs and local law enforcement, including, but not limited to:

- **Murder -** The willful (non-negligent) killing of one human being by another.
- **Negligent Manslaughter -** The killing of another person through gross negligence.
- **Forcible Sex Offenses -** Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent. Forcible sex offenses include:
    - **Rape -** 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 consent of the victim.
    - **Fondling -** The touching of the private body parts of another person for the purpose of sexual gratification, with 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.
- **Non-forcible Sex Offenses** - Any sexual act direct against another person without consent of the victim, including instances where the victim is incapable of giving consent. Other sex offenses include:
- **Incest -** Sexual intercourse between persons who are related to each other within the degrees where marriage is prohibited by law.
- **Statutory Rape -** Sexual intercourse with a person who is under the statutory age of consent.
- **Robbery -** The taking, or attempting to take, anything of value under confrontational circumstances from the control, custody, or care of another person by force or threat of force or violence, and/or by putting the victim in fear.
- **Aggravated Assault -** An unlawful attack by one person upon another where either the offender displays a weapon, or the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **Burglary -** The unlawful entry into a building or other structure with the intent to commit a felony or a theft.

- **Motor Vehicle Theft -** The theft or attempted theft of a motor vehicle.
- **Arson** - To unlawfully and intentionally damage, or attempt to damage, any real or personal property by fire or incendiary device.
- **Liquor Law Violations** - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of intoxicating alcoholic beverages.
- **Drug Related Violations (Sale and Possession)** - The unlawful cultivation, manufacture, distribution, sale, purchase, possession, transportation, or importation of any controlled drug or narcotic substance; or, the unlawful manufacture, sale, purchase, possession, or transportation of equipment or devices used for preparing and/or taking drugs or narcotics (drug paraphernalia).
- **Weapon Law Violations** - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.
- **Domestic Violence** - Includes felony or misdemeanor crimes 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 receiving grant monies, 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.
- **Dating Violence** - Violence committed by a person (A) who is or has been in a social relationship of a romantic or Intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship, (ii) The type of relationship, (iii) The frequency of interaction between the persons involved in the relationship.
- **Stalking** - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

Annual Security Report: A required annual report setting forth statistics for Clery Act Crimes and disciplinary referrals for drug, alcohol, and weapon offenses by type, location and year; campus security and policy statements; procedures for issuing to the campus community Timely Warnings of potentially dangerous criminal and emergency situations; campus evacuation procedures; and locations for obtaining information concerning registered sex offenders from state law enforcement agencies.

Clery Geography Map: A map depicting the Core Campus and surrounding area that identifies on-campus property, non-campus property and public property.

Core Campus: The same reasonably contiguous area of buildings or property owned or controlled by NATS that the campus and its students consider to be, and treat as, an integral part of the main campus; that are directly supported, or related to NATS's educational purposes; and that are covered by the same security and safety policies.

Crime Alerts/Emergency Notification: Alerts that are published when a crime occurs on or near a campus that potentially threatens the campus community and which are reported to campus officials or to local law enforcement. The manner of dissemination to alert the campus community may include one or more of the following methods: email, voice mail and text messaging. In addition, the Security Compliance Officer or other campus official may post relevant warnings, updates and advisories on the appropriate campus bulletin board or social media web page.

On-Campus Property: Any building or property on the Core Campus and any building or property on the Core Campus that is owned by the campus, but is controlled by another person, is frequently used by students, and supports campus purposes.

Public Property: All public property, including thoroughfares, streets, sidewalks and parking facilities, that is within the Core Campus or immediately adjacent to and accessible from the Core Campus.

Timely Warning: An announcement to inform the campus community of Clery Act Crimes and other serious incidents when a reported crime may pose a serious or continuing threat to the campus and surrounding community.

III. THE ANNUAL SAFETY AND SECURITY REPORT

Each year NATS publishes a report containing crime statistics from the previous year that were reported to local police agencies or to campus security authorities (CSAs) that occurred at the following locations:

- On campus
- In certain off-campus buildings, owned, or controlled by NATS
- Public property within or immediately adjacent to and accessible from the campus.

The statistics in the report reflect the number of criminal incidents reported to the various authorities. The report also includes institutional policies concerning alcohol and drug use, crime prevention, the reporting of crimes, sexual assault and other matters. NATS's Annual Safety and Security Report (ASR) is attached. If, as you are reading the attached report, you find that you have any comments, questions or concerns, please address them to: North American Trade Schools, ATTN: Security Compliance Officer, 6901 Security Blvd Suite 16 Baltimore, MD 21244.

NATS has designated the Security Compliance Officer as the responsible party for compiling all data used to prepare the annual campus crime statistics report. Campus crime data is gathered the same day it is reported. The data is obtained annually from reports made to local law enforcement and compared to the data collected by the school. Crimes are counted in the disclosure based upon the crime having been reported, not whether there was a conviction resulting from the crime. The resulting data is used to prepare the Annual Security Report (ASR). The ASR is published and distributed annually by October 1 of each year to current students and employees. A notice of the ASR's availability is also provided to prospective students and employees, with a notice that a paper copy is available upon request. An electronic copy is available on NATS's website: https:///www.natradeschools.edu.

IV. PROCESSES, PROCEDURES, AND GUIDELINES

Responsibilities

- General Responsibilities
  - All faculty, staff and students must promptly and accurately report all suspected Clery Act Crimes and significant emergencies or dangerous situations occurring on **On-Campus Property**, **Non-Campus Property** and **Public Property** to a member of the CSA at their campus.
  - All visitors must promptly and accurately report all suspected Clery Act Crimes and significant emergencies or dangerous situations occurring on **On-Campus Property**, **Non-Campus Property** and **Public Property** to a member of the CSA at the applicable campus.
  - All campuses must maintain for seven (7) years all Clery Act related documentation.

- Security Compliance Officer's Responsibilities:
  - Responsible for gathering the data used to prepare the annual crime statistics report.
  - Must attend mandatory training.
  - Provide training for other members of the Campus Security Committee.

- Campus Security Authorities (CSA's) Responsibilities:
  - All members appointed must attend mandatory training.
  - All members of CSA must report suspected Clery Act Crimes that are brought to their attentions or that they personally witness, regardless whether the victim or alleged suspect are associated with NATS.
  - All members of CSA must ensure that NATS Incident Report Forms are completed as soon as possible and then either follow up on the report personally, or assign responsibility to the Security Compliance Officer to investigate.

- All members of CSA must take any and all preventative measures or actions to ensure the safety and security of all staff, faculty and students.

- Campus Director Responsibilities:

  - Must provide all prospective employees with a copy of the Annual Security Report.
  - Must ensure that all newly hired employees are informed of the policies and procedures for reporting a Clery Crime.
  - Must provide refresher information and annual awareness training on the Clery Act Compliance measures.
  - Must provide the Security Compliance Officer with any liquor, drug or weapon violations resulting in discipline for employees on an annual basis.
  - Must provide all prospective students with a copy of the Annual Security Report.
  - Must ensure that all newly enrolled students have a copy of the policy and understand the process for filing a report.

Reporting Crimes on Campus

- Members of the NATS community are cautioned to never attempt to apprehend or pursue a suspected criminal. Crimes or suspicious activity should be reported to a member of the CSA or Campus Security Officer, or, if appropriate, contact local law enforcement by dialing 9-1-1.

- If there are any doubts about whether to report an incident that has occurred, report it. Victims of, or witnesses to crimes may disclose them on a voluntary, confidential basis with a member of CSA, which can assist them in determining whether the event constitutes a crime that has to be collected and statistically reported. The cooperation of all community members to report in a timely manner assists NATS in issuing equally timely warnings to the campus community.

- All members of the campus community should be aware of their surroundings at all times. All should use their eyes, ears and telephone to keep campus officials advised of what is seen and heard campus-wide. The campus should be notified if any of the following are observed:

  - Strangers loitering in office areas, hallways, classrooms or lounge areas.
  - Unsecured doors or windows in campus buildings when they should be locked.
  - Any person tampering with a motor vehicle or loitering in the parking lot(s).
  - Any person publicly displaying a weapon.
  - Any person loitering in a dark, secluded area.

- Any suspicious person carrying articles, equipment, luggage or other questionable packages out of campus buildings.

Safety Tips

- Crime is a serious problem with no quick or easy solution. All members of the NATS community are encouraged to assist one another by taking responsibility for personal safety and assisting with the security needs of others. While NATS staff and security measures offer assistance with regards to safety concerns, ultimately, the primary responsibility for personal safety lies with the individual.

  Below are some things that all members of the NATS community need to remember:
  - Be aware of your surroundings at all times, no matter where you are.
  - If you feel uncomfortable in a place, leave right away.
  - Keep your eyes and ears open and your hand free.
  - Choose busy streets and avoid going through dark, deserted areas.
  - At night, walk in well-lit areas whenever possible.
  - Avoid carrying large sums of cash.
  - When in public spaces, keep valuable items including jewelry, mobile phones and wallets out of sight.
  - Carry a pepper or mace spray as a precautionary measure.
  - Walk in groups, to and from buildings, when leaving or entering buildings after dark.
  - Communicate any suspicious behavior immediately.

V. SECURITY, PERSONAL SAFETY & CRIME PREVENTION

NATS provides information on personal safety and crime prevention. The Director of Education maintains a directory of services that are available to assist those who have suffered a criminal act. These services are usually free and are provided by the community. During orientation of students, faculty and staff, procedures are outlined to cover the reporting of all criminal acts.

Campus Sex Crimes Prevention Act

The Federal Campus Sex Crimes Prevention Act became effective on October 27, 2002 and requires all eligible institutions participating in Title IV federal Student aid programs to issue a statement advising the campus community where the state law enforcement agency information concerning registered sex offenders/predators may be obtained. Sex offenders are required to be registered according to the state law in the state in which they reside and are also required to notify appropriate state officials of each post-secondary school at which the offender is employed or a student. Any such offender is also required to give notice to the appropriate state authorities of any changes in enrollment or employment status at the postsecondary school.

Registered Sex Offender Information

Information regarding registered sex offenders in the State of Maryland may be obtained by accessing the Maryland SOR search web page at www.dpscs.state.md.us/sorsearch or by calling the Megan's Law Section at 866-771-3170.

To search for registered sex offenders anywhere in the United States, the National Sex Offender Registry can be accessed at: https://www.nsopw.gov.

Campus Sexual Violence Elimination Act of 2013 (SaVE Act)

The Campus SaVE Act requires schools to educate students, staff and faculty on the prevention of rape, acquaintance rape, domestic violence, dating violence, sexual assault and stalking. As part of NATS's compliance with the SaVE Act requirements for prevention and awareness, NATS has developed programs that address the specified areas above and provide resources for victims and their family members. All members of the NATS community may find reference material in regards to these programs in the office of the Director of Education.

NATS has an established a policy and process for Sexual Misconduct (please refer to the Sexual Misconduct Policy), that provides the framework to the organization's sexual assault prevention program. The following is not an all-inclusive list of some of the highlights of NATS's sexual assault prevention program:

- Always use the "buddy system" when entering or exiting the building(s) at night (i.e. parking lot).
- Leave the building in a group when classes are dismissed, especially after dark.
- If an assault occurs, notify the Title IX or Deputy Title IX Coordinator immediately.
- Do not disturb the crime scene.
- Notify local law enforcement.
- Ensure that the victim is safe and seek medical attention, if necessary.
- Secure counseling for the victim, or offer a referral to one of the community based resources.
- Provide accommodations to the victim, such as schedule changes, etc., if requested.
- Disciplinary actions implemented per policy.

Please refer to the NATS's Sexual Misconduct Policy to review all procedures, resources and regulations in regards to sexual violence/misconduct. NATS does not tolerate sexual misconduct, in any form, against females or males, whether committed by a stranger or by an acquaintance. NATS attempts to protect all members of its

community, including visitors, from any form of sexual misconduct and offers all members of the NATS community that subjected to any type of sexual misconduct within the context of the NATS community, the support necessary to enable them to continue and pursue their academic and career goals.

Reporting the Sexual Assault/ Misconduct

All NATS employees, including faculty, staff, administrators and student employees who have a responsibility for student welfare are required to share with a member of the Title IX team any report of sexual assault/misconduct they receive or of any which they become aware. All NATS community members, even those who are not obligated by this policy, are strongly encouraged to report information regarding any incident of sexual misconduct to a member of the Title IX team. Matt Daly- Title IX coordinator, and Matt Mann –Director of Education

The Title IX coordinator will ensure that the NATS responds to all reports in a timely, effective and consistent manner. The NATS Title IX team consists of the Title IX Coordinator and the Director of Education. The team is charged with the review, investigation and resolution of all reports to ensure consistent responsiveness and the integrated provision of interim measures to support the individuals involved and to protect the campus community. It is only through this consistent and informed response that we create culture of accountability and break the culture of silence.

The Title IX team is positioned to provide seamless support, assess campus safety and effectively respond to allegations of sexual misconduct. NATS will promptly and thoroughly investigate and respond to all reports of sexual misconduct. NATS will respond to all reports in an integrated, consistent manner that treats each individual with dignity and respect. NATS will approach each report with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

NATS is committed to providing a variety of welcoming and accessible means so that all instances of sexual misconduct will be reported. NATS also recognizes that the decision whether or not to report sexual misconduct is personal, and that there are many barriers to reporting, both individual and societal. Not every individual will be prepared to make a report to NATS or to law enforcement, and individuals are not expected or required to pursue a specific course of action. An incident does not have to occur on campus to be reported to NATS. Off-campus conduct that adversely affects NATS or the NATS community also falls under this policy.

An individual does not have to decide whether or not to request disciplinary action at the time the report is made. NATS recognizes that choosing to make a report, and deciding how to proceed after making the report, can be a process that unfolds over time. NATS will respect an individual's autonomy in making these important decisions

and provide support that will assist each individual in making that determination.

FOR FURTHER INFORMATION ON REPORTING, RESOURCES OR INFORMATION ON NATS's SEXUAL MISCONDUCT POLICY AND PROCEDURES, PLEASE REFER TO THE SEXUAL MISCONDUCT POLICY.

Emergency Response and Evacuation Procedures

NATS has in place a campus response protocol. In an emergency or dangerous situation, upon confirmation from the Campus Director, or designee, of the need for mass notification, the Campus Director, or designee, will, without delay, taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Emergency or dangerous situations may include, but are not limited to, gas leaks, tornadoes, contagious viruses, etc.

Emergency Notifications

In the event of an emergency or a dangerous situation that poses an immediate threat to the campus community, NATS may utilize some, or all, of its mass notification capabilities to notify its campus community. These capabilities include email, voice mail, and/or text messaging to alert the campus community. In addition, members of the administration may post relevant updates and advisories on the appropriate school website (https://www.natradeschools.edu) and campus bulletin boards. The Campus Director, or designees, will simultaneously use the local means at his/her/their disposal to notify all NATS community members of the situation, as well as, disseminate pertinent information to relevant public entities.

This emergency notification requirement does not replace the timely warning requirement described earlier. They differ in that the timely warning applies only to the Clery reportable crimes, while the emergency notification requirement addresses a much wider range of threats. However, an institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances, but must provide adequate follow-up information to the community, as needed. Training, exercises and tests will be conducted annually by management at the campus level and by the individuals relevant to the mass notification. Management will document each test conducted by all relevant entities.

NATS Emergency Response

NATS takes various precautionary measures to protect the students, staff, faculty and visitors. Nevertheless, unavoidable emergencies may occur in extreme situations. Therefore, NATS has a Campus Response Team (CRT) that implements and oversees the

campus response to a crisis situation. The CRT receives training in dealing with crisis situations and will primarily direct the immediate response to a crisis situation until the arrival of law enforcement and emergency response personnel. In order to make this program effective, students are required to familiarize themselves with the following emergency procedures. Nothing herein precludes any student, staff or faculty from contacting the appropriate local authorities in the event they feel the threat of physical harm or imminent danger. *** In the event of an emergency – dial 9-1-1 ***

Student Emergency Response

There is the potential for students to be involved in a variety of emergency situations for which appropriate actions must be taken. These possible situations include incidences that may require emergency evacuation, emergency lockdown, external lockdown or to shelter in place.

- **Emergency Evacuation** -- Evacuation is the movement of campus occupants from a dangerous or potentially dangerous location to a safe location. There are two types of evacuation: a fire evacuation and a non-fire evacuation.
    - Fire Evacuation
        - Evacuation is mandatory when a fire alarm is activated.
        - Follow authorized personnel's (e.g. faculty, staff or fire department personnel, etc.) instructions, if given.
        - Do not use elevators.
        - Assist people with disabilities, if possible.
        - Do not attempt to reenter the facility unless and until directed to do so by authorized personnel.
        - Evacuate to a safe distance and location from the building affected, away from any fire hydrants, fire lanes and not under any power lines.
    - Non-fire Evacuation
        - Will be initiated by campus personnel.
        - Follow campus personnel's instructions, if given.
        - Do not use elevators.
        - Assist people with disabilities, if possible.
        - Do not attempt to reenter the facility unless directed to do so.

- **Emergency Lockdown --** Emergency lockdown is used to dramatically and rapidly enhance the level of security on a campus. By locking all exterior, interior and classroom doors, staff can make it more difficult for dangerous person(s) in the vicinity of the campus and in the campus to gain access to staff and students;
    - Lock or barricade doors of office, classrooms and internal student/faculty

areas of congregation.
    - Close blinds, turn off lights.
    - Remain quiet and out of sight.
    - If gunshots are heard, lie on the floor and attempt to use available resources for additional cover and concealment.
    - If outside when a lockdown is declared, seek shelter away from the danger.
    - If a fire alarm is activated during the lockdown, proceed with extreme caution.
    - Do not open any door for people claiming to be public safety personnel unless you have an opportunity to view photo identification or are instructed to do so by a staff member that you recognize.

- **External Lockdown --** External lockdown creates a physical layer of security between the internal and external dimensions of the campus. In addition to locked entrances, this may also include a supervised entry and exit to campus facilities, and/or barricade to campus property (e.g. barricades or chains restricting access to campus parking or grounds). This lockdown allows staff and students to continue activities while maintaining access control to the campus and remain in an elevated state of security.

    - Remain in classroom.
    - Follow faculty and staff instructions.
    - Remain attentive to any changes in status.

- **Shelter in Place –** sheltering in place procedures are traditionally utilized when a tornado is spotted, or there has been a chemical or biological incident outside of, but in the proximity to a campus and available information indicates that there is no adequate time to evacuate building occupants to another safe location before the dangerous contaminants reach the facility.
    - Follow staff and faculty instructions.
    - Assist people with disabilities, if possible.
    - If you are outside when a shelter in place is declared, immediately seek an interior room or hallway with no windows.
    - Close windows and doors – do no lock doors.
    - Remain in shelter until an “all clear” is given.

Staff Emergency Response

NATS takes various precautionary measures to protect the students, faculty, staff and campus visitors. Nevertheless, unavoidable emergencies may occur in extreme situations. Therefore, NATS has a Campus response team (CRT) that implements and overseas the campus response to a crisis situation. The CRT receives training in dealing

with crisis situations and will primarily direct the immediate response to a crisis situation until the arrival of law enforcements or emergency response personnel.

In order to make this program effective, all staff, faculty and administrations are expected to familiarize themselves with the following emergency procedures.

Staff Response:

- All staff located outdoors should quickly gather all students and individuals in the area and instruct them to go inside the facility immediately. Once inside, if possible, instruct everyone to move to an interior area without or away from windows or doors.
- Close all windows and doors.
- In the event of a chemical spill/biological incident, if available, use tape to cover all windows and doors with sheets of plastic to help reduce airflow into the area. Wet towels can be used to reduce the airflow under the doors. Close all outside vents. Turn off all heating and ventilation systems, use damp towels or cloths to cover any openings in walls or doors. Tape can also be used to cover any cracks, crevices, electrical outlets, cable television connections or other openings that might allow air to flow into the shelter area.
- Listen to local radio or television news for instructions from emergency management and public safety officials.
- Review emergency evacuation protocols.

Sexual Misconduct Policy

I. PURPOSE AND SCOPE OF POLICY

Statement of Institutional Values

Sexual misconduct of any form is a violation of a person's rights, dignity and integrity. An act of sexual misconduct represents a fundamental failure by a community member to recognize and respect the intrinsic worth and dignity of another. Acts of sexual misconduct are harmful and illegal and will not be tolerated at North American Trade Schools (NATS). Such acts corrupt the integrity of the educational process, are contrary to the mission and values of the NATS community and are against NATS policy.

All members of the NATS community should be free from sexual misconduct in the classroom, the social and recreational environment, as well as the workplace. NATS seeks to foster a climate free from sexual misconduct through a coordinated education and prevention program, the promulgation of clear and effective policies, as well as investigative and grievance procedures that are prompt, equitable, and accessible to all.

In response to any reported sexual misconduct, NATS will take all appropriate steps to eliminate the misconduct, prevent its recurrence and address its effects.

In order to foster a climate of respect for oneself and for one another and provide for the safety and security of our community, NATS expects all community members to take action to prevent acts of sexual misconduct. Creating a safe campus environment is the responsibility of all members of the NATS community, both individually and collectively.

In order to achieve equitable results, NATS will carefully review and/or investigate all reports with an earnest intent to understand the perspective and experiences of each individual involved, and provide for fair and impartial evaluation and resolution.

Sexual Assault Prevention, Risk Reduction, and Awareness Programs

NATS engages in comprehensive, intentional and integrated programming intended to respond to and prevent sexual assault, domestic violence, dating and stalking that:

- Is culturally relevant, inclusive of diverse communities and identities, sustainable, responds to community needs, and is informed by research or assessed for value, effectiveness, or outcome.
- Considers environmental risk and protective factors as they occur to the individual, relationship, institutional, community, and societal levels.

Educational programming consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention for students and employees that:

- Identify sexual assault, domestic violence, dating violence, and stalking as prohibited conduct.
- Defines using definitions provided by the Department of Education and state law what behavior and actions constitute consent to sexual activity.
- Provides a description of safe and positive options for bystander intervention. **Bystander intervention** means safe, effective, and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of harm, including sexual assault, domestic violence, dating violence, or stalking. Bystander intervention includes recognizing situations of potential harm, evaluating the situations and options, and deciding what intervention is appropriate.
- Describe risk-reduction options. **Risk reduction** means options designed to decrease perpetration and bystander interaction and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.
- Raise awareness of the prohibitive behavior and/or consent and healthy relationships. **Awareness programs** are those programs that raise awareness of

the various offenses, behaviors, and/or prosocial behaviors in regards to prevalence, statistics, normative information, options, resources, services, or other areas of interest/or concern.

- Encourage primary prevention. **Primary prevention programs** are designed to prevent an offense from occurring. Such programs include information regarding consent, healthy relationships, and positive prosocial behavior.
- NATS's ongoing prevention awareness continues the ongoing goal of preventing and raising awareness of sexual assault, domestic violence, dating violence, and stalking.

NATS has developed an educational campaign consisting of presentations that include distribution of educational material to new students and participating in and presenting information and materials during new employee orientation.

Purpose of the Policy

The purpose of this policy is to provide the NATS community with a clearly articulated set of behavioral standards, common understandings of definitions and key concepts, and descriptions of prohibited conduct. The policy applies to all NATS community members, including students, faculty, and staff. It is intended to protect and guide students, faculty and staff who have been affected by sexual misconduct, whether as a complainant, a respondent, or a third party.

When used in the policy, a complainant refers to the individual who believes that he/she/they have been the subject of sexual misconduct. A respondent refers to the individual who has been accused of sexual misconduct. A third party refers to any other participant in the process, including a witness to the incident or an individual who makes a report on behalf of someone else. A report refers to any incident or concern regarding sexual misconduct that is reported to NATS. A complaint is an allegation of sexual misconduct filed against a faculty or staff member or student that initiates the appropriate disciplinary process.

In addition to defining sexual harassment and the forms of sexual misconduct that violate the standards of our community, this policy will also:

- Identify resources and support for all members of the NATS community;
- Identify the Title IX Coordinator, Deputy Coordinators and their roles;
- Provide information about where an NATS community member can obtain support or access to resources in a confidential manner;
- Provide information about how an NATS community member can make a report on-campus and off-campus, and;
- Provide information about how a report against an NATS community member will be investigated, evaluated and resolved.

Scope

As stated above, this policy applies to all members of the NATS community, including students, employees, visitors and independent contractors. When used in the policy, employees generally refer to both staff and faculty members, although there are separate complaint processes delineated for employees and students. Vendors, independent contractors, visitors and others who conduct business with NATS or on NATS property are also expected to comply with this policy.

All NATS community members are responsible for their actions and behavior, whether the conduct occurs on campus or in another location. Members of the NATS community have a responsibility to adhere to College policies and local, state and federal law. As a result, this policy applies both to on-campus and off-campus conduct. In particular, off-campus behaviors that have an actual or potential adverse impact on any member of the NATS community or NATS, itself, fall under this policy.

Any individual may make a report alleging a violation of this policy. NATS will provide resource options and respond promptly and equitably to all allegations of sexual misconduct. NATS will engage in a Title IX review which it is committed to maintaining fairness for all parties and to balancing the needs and interests of the individuals involved with the safety of the community as a whole.

Coordination with Non-Discrimination Policy

North American Trade Schools (NATS) recognizes harassment related to an individual's sex, sexual orientation, gender identity or gender expression can occur in conjunction with misconduct related to an individual's race, color, ethnicity, national origin, religion, age, military or veteran status or disability. Targeting individuals on the basis of these characteristics is also a violation of NATS community standards. Under these circumstances, NATS will coordinate the investigation and resolution efforts to address harassment related to the targeted individual's sex, sexual orientation, gender identity or gender expression together with the conduct related to the targeted individual's race, color, ethnicity, national origin, religion, age, military or veteran status or disability.

II. NOTICE OF NON-DISCRIMINATION

NATS is committed to establishing and maintaining an environment free from all forms of harassment and discrimination for all NATS community members. NATS does not discriminate on the basis of race, color, ethnicity, national origin, age, sex, sexual orientation, gender identity or expression, physical or mental disability, religion, military or veteran status or any other protected class. NATS does not discriminate on the basis of sex in its educational, extracurricular, athletic or other programs or in the context of employment. Sexual misconduct, including sexual harassment as defined by

this policy, is a form of sex discrimination that unjustly deprives a person of equal treatment. It is prohibited under Title IX of the educational Amendments of 1972, a federal law that provides that: No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Sexual harassment is also prohibited under Title VII of the Civil Rights Act of 1964. This policy prohibits sexual misconduct against all NATS community members of any gender or sexual orientation. This policy prohibits gender-based harassment that does not involve conduct of a sexual nature.

III. NATS STATEMENT OF PRIVACY

North American Trade Schools is committed to maintaining the privacy of all individuals involved in a report of sexual misconduct, in any Title IX review of an allegation of sexual misconduct, every effort will be made to protect the privacy and interests of the individuals involved in a manner consistent with the need for a thorough review of the allegation. Such a review is essential to protecting the safety of the complainant, the respondent, and the broader campus community, and to maintaining an environment free from sexual discrimination.

At all times, the privacy of the parties will be respected and safeguarded. Information related to a report of misconduct will be shared only with those NATS employees who "need to know" in order to assist in the investigation and/or resolution of the complaint. All NATS employees who are involved in the Title IX review process have received specific training regarding the safeguarding of private information. Students and employees wishing to obtain confidential assistance through on-campus or off-campus resources without making a report to NATS may do so by speaking with professionals who are obligated by law to maintain confidentiality. These non-NATS professionals include:

Maryland Crisis Intervention Hotline:

Dial 211

TurnAround, INC.
1800 North Charles Street
Suite 404
Baltimore, MD 21201
443-279-0379

Crisis Response Hotline (Baltimore County)
410-931-2214

Domestic Violence and Sexual Assault Hotline (Baltimore County and City)
410-857-0077

For Additional Information, online Maryland Community Services Locator
www.mdcsl.org

When NATS has received a report of sexual misconduct, but the complainant requests that his/her identity remain confidential, or that NATS not pursue an investigation, NATS will balance this request with its responsibility to provide a safe and non-discriminatory environment for all NATS community members. NATS will take all reasonable steps to investigate and respond to the complaint consistent with the request for confidentiality or request not to pursue an investigation. At all times, NATS will seek to respect the request of the complainant, and where it cannot do so, NATS will consult with the complainant and keep him/her/them informed about the chosen course of action.

If a report of misconduct discloses an immediate threat to the NATS community, NATS may issue a timely notice of the conduct to the community to protect the health or safety of the broader campus community. This notice will not contain any biographical or other identifying information. Immediately threatening circumstances include, but are not limited to, recently reported incidents of sexual misconduct that include the use of force, a weapon, or other circumstances that represent a serious and ongoing threat to NATS students, faculty, administrators, staff or visitors. All resolution proceedings are conducted in compliance with the requirements of FERPA, the Clery Act, Title IX and NATS policy. No information shall be released from such proceedings except as required or permitted by law and NATS policy.

IV. PROHIBITED CONDUCT AND DEFINITIONS

North American Trade Schools (NATS) prohibits sexual misconduct. Sexual misconduct is a broad term that includes, but is not limited to sexual harassment, sexual violence, sexual exploitation, stalking, cyber-stalking, bullying and cyber-bullying, aiding or facilitating the commission of a violation, and retaliation. Consistent with the values of an educational and employment environment free from harassment based on sex, NATS also prohibits gender-based harassment, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex stereo-typing, even if those acts do not involve conduct of a sexual nature.

Definition of Sexual Harassment

Sexual harassment is any unwelcome sexual advance, request for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature when:

- Submission to or rejection of such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment, evaluation of academic work

or participation in social or extracurricular activities.

- Submission to or rejection of such conduct by an individual is used as the basis for decisions affecting the individual, or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance by creating an intimidating, hostile, humiliating, demeaning or sexually offensive working, academic or social environment. The effect will be evaluated based on the perspective or a reasonable person in the position of the complainant.

A single or isolated incident of sexual harassment may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to provide a hostile environment, particularly if the harassment is physical.

Forms of Prohibited Sexual Harassment

Sexual harassment is prohibited. In some cases, sexual harassment is obvious and may involve an overt action, a threat or reprisal. In other instances, sexual harassment is subtle and indirect, with a coercive aspect that is unstated.

Sexual harassment can take many forms:

- It can occur between equals (e.g. student to student, staff to staff, faculty member to faculty member, visitor/contracted employee to staff) or between persons of unequal power status (e.g. supervisor to subordinate, faculty member to student). Although sexual harassment often occurs in the context of an exploitation of power by the individual with the greater power, a person who appears to have less power in a relationship can also commit sexual harassment (e.g. student harassing a faculty member).
- It can be committed by an individual or may be a result of the collective actions of an organization or group.
- It can be committed against an individual, an organization or a group.
- It can be committed by an acquaintance, a stranger, or someone with whom the complainant has a personal, intimate or sexual relationship.
- It can occur by or against an individual of any sex, gender identity, gender expression or sexual orientation.
- It does NOT have to include intent to harm, be directed at a specific target, or involve repeat incidents.

Examples of behavior that might be considered misconduct include, but are not limited to:

- Unwanted or inappropriate sexual innuendo, propositions, sexual attention or

suggestive comments and gestures, humor and jokes about sex or gender-specific traits; sexual slurs or derogatory language directed at another person's sexuality or gender; insults and threats based on sex or gender; and other oral, written or electronic communications of a sexual nature that an individual communicates is unwanted and unwelcome;

- Written graffiti or the display or distribution of sexually explicit drawings, pictures or written materials; sexually charged name-calling; sexual rumors or ratings of sexual activity/performance; the circulation, display, or creation of emails or web sites of a sexual nature;
- Non-academic display or circulation of written materials or pictures degrading to an individual(s) or gender group (it is expected that instructors will offer appropriate warning regarding the introduction of explicit and triggering materials in the classroom);
- Inappropriate or unwelcome physical contact or suggestive body language, such as touching, patting, pinching, hugging, kissing, or brushing against an individual's body;
- Undue and unwanted attention, such as repeated inappropriate flirting, inappropriate or repetitive compliments about clothing or physical attributes, staring, or making sexually oriented gestures;
- Physical coercion or pressure of an individual to engage in sexual activity or punishment for a refusal to respond or comply with sexual advances;
- Change of academic or employment responsibilities (increase in difficulty or decrease of responsibility) based on sex, gender identity/expression, or sexual orientation;
- Use of a position of power or authority to: (1) threaten or punish, either directly or by implication, for refusing to tolerate harassment, for refusing to submit to sexual activity, or for reporting harassment; or (2) promise rewards in return for sexual favors.
- Sexual assault;
- Abusive, disruptive or harassing behavior, verbal or physical, which endangers another's mental or physical health, including but not limited to threats, acts of violence, or assault based on gender and/or in the context of intimate partner violence;
- Demeaning verbal or other expressive behavior of a sexual or gendered nature in instructional settings; and
- Acts of verbal, nonverbal or physical aggression, intimidation or hostility based on sex or sex-stereotyping. Harassment for exhibiting what is perceived as a stereotypical characteristic for one's sex, or for failing to conform to stereotypical notions of masculinity and femininity, regardless of actual or perceived sexual orientation or gender identity or the harasser or target.

Additional Forms of Prohibited Sexual Misconduct

Sexual misconduct may vary in its severity and consists of a range of behaviors. The following descriptions represent sexual behaviors that violate NATS's community standards and a person's rights, dignity and integrity.

- **Sexual Violence:** Physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent. This includes rape, sexual assault, battery and sexual coercion. Sexual violence may involve individuals who are known to one another or have an intimate and/or sexual relationship, or may involve individuals no known to one another. Examples include, but are not limited to:
    - Having or attempting to have sexual intercourse with another individual without consent. Sexual intercourse includes vaginal or anal penetration, however slight, with a body part or object, or oral copulation by mouth-to-genital contact.
    - Having or attempting to have sexual contact with another individual without consent. Sexual contact includes kissing, touching intimate parts of another, causing the other to touch one's intimate parts, or disrobing of another without permission. Intimate parts may include breasts, genitals, buttocks, mouth or any other part of the body that is touched in a sexual manner.
- **Sexual Exploitation:** An act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage or any other non-legitimate purpose. The act or acts of sexual exploitation are prohibited even though the behavior does not constitute one of the other sexual misconduct offenses. Sexual exploitation may involve individuals who are known to one another, have an intimate or sexual relationship, and/or may involve individuals not known to one another. Examples include, but are not limited to:
    - Observing another individual's nudity or sexual activity or allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;
    - Non-consensual streaming of images, photography, video or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved;
    - Prostituting another individual; or knowingly exposing another individual to a sexually transmitted disease or virus without his or her knowledge; and
    - Inducing incapacitation for the purpose of making another person vulnerable to non-consensual sexual activity.
- **Stalking:** A course of conduct involving more than one instance of unwanted attention, harassment, physical or verbal contact, or any other course of conduct directed at an individual that could be reasonably regarded as likely to alarm or place that individual in fear of harm or injury, including physical, emotional, or

psychological harm. This includes cyber-stalking, a particular form of stalking in electronic media such as the Internet, social networks, blogs, cell phones, texts or other similar devices or forms of contact are used to pursue, harass or make unwelcome contact with another person. Stalking and cyber-stalking may involve individuals who are known to one another or have an intimate or sexual relationship, or may involve individuals not known to one another.

- **Aiding or Facilitating:** Aids, facilitates, promotes or encourages the commission of a violation under this policy. Aiding or facilitating may also include failing to take action to prevent an imminent act when it is reasonably prudent and safe to do so. Taking action may include direct intervention, calling campus security or local law enforcement, or seeking assistance from a person with authority.
- **Retaliation:** Acts or attempts to retaliate or seek retribution against the complainant, respondent or an individual or group of individuals involved in the investigation and/or resolution of an allegation of sexual misconduct. Retaliation can be committed by any individual or group of individuals, not just a respondent or a complainant. Retaliation may include continued abuse or violence, other forms of harassment, slander and libel.

Statement on Consent, Coercion, Incapacitation, and Alcohol

Consent to engage in sexual activity must be knowing and voluntary. Consent to engage in sexual activity must exist from the beginning to end of each instance of sexual activity, and for each form of sexual contact. Consent to one form of sexual contact does not constitute consent to all forms of sexual contact. For example, an individual may agree to kiss but choose not to engage in touching of the intimate parts or sexual intercourse. An individual should obtain consent before moving from one act to another.

Consent consists of an outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. Relying on non-verbal communication can lead to misunderstandings. Consent may not be inferred from silence, passivity, lack of resistance or lack of active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. In the absence of an outward demonstration, consent does not exist If, at any time, it is reasonably apparent that either party is hesitant, confused or uncertain, both parties should stop and obtain mutual verbal consent before continuing sexual activity.

A current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates willingness to engage in sexual activity each time such activity occurs.

Consent may be withdrawn by either party at any time. Withdrawal of consent must also be outwardly demonstrated by words or actions that clearly indicate a desire to end sexual activity. Once withdrawal of consent has been expressed, sexual activity must cease.

Consent is not effective if it results from the use or threat of physical force, intimidation, or coercion, or any other factor that would eliminate an individual's ability to exercise his or her own free will to choose whether or not to have sexual contact. Coercion includes the use of pressure and/or oppressive behavior, including express or implied threats of harm, severe and/or pervasive emotional intimidation, which places an individual in fear of immediate or future harm or physical injury or causes a person to engage in unwelcome sexual activity. A person's words or conduct amount to coercion if they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity.

An individual who is incapacitated is not able to make rational, reasonable judgments and therefore, is incapable of giving consent. Incapacitation is the inability, temporarily or permanently, to give consent, because the individual is mentally and/or physically helpless due to drug or alcohol consumption, either voluntarily or involuntarily, or the individual is unconscious, asleep or otherwise unaware that the sexual activity is occurring. In addition, an individual is incapacitated if he/she/they demonstrate that they are unaware of where they are, how they got there, or why or how they became engaged in sexual interaction. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication.

Some indicators of incapacitation may include, but are not limited to, lack of control over physical movements, lack of awareness of circumstances or surroundings, or the inability to communicate for any reason. An individual may experience a blackout state in which he/she/they appear to be giving consent, but do not actually have conscious awareness or the ability to consent. It is especially important, therefore, that anyone engaging in sexual activity be aware of the other person's level of intoxication. The relevant standard that will be applied is whether the respondent knew, or a sober reasonable person in the same position should have known, that the other party was incapacitated and therefore could consent to sexual activity.

NATS considers sexual contact while under the influence of alcohol to be risky behavior. Alcohol impairs a person's decision-making capacity, awareness of the consequences, and ability to make informed judgments. Being intoxicated or impaired by drugs or alcohol is never an excuse for sexual misconduct and does not excuse one from the responsibility to obtain consent.

Consensual Relationships

Amorous, dating, or sexual relationships that might be appropriate in other

circumstances have inherent dangers when they occur between a faculty member, supervisor, or other member of the NATS community and any person for whom he or she has a professional responsibility. These dangers can include: that a student or employee may feel coerced into an unwanted relationship because he or she fears that refusal to enter into the relationship will adversely affix his or her education or employment; that conflicts of interest may arise when a faculty member, supervisor, or other member of the NATS community is required to evaluate the work or make personnel or academic decisions with respect to an individual with who he or she is having a romantic relationship; that students or employees may perceive that a fellow student or co-worker who is involved in a romantic relationship will receive an unfair advantage; and that if the relationship ends in a way that is not amicable, either or both of the parties may wish to take action to injure the other party.

Faculty members, supervisors, and other members of the NATS community who have professional responsibility for other individuals, accordingly, should be aware that any romantic or sexual involvement with a student or employee for whom they have such a responsibility may raise questions as to the mutuality of the relationship and may lead to charges of sexual harassment. For the reasons stated above, such relationships are strongly discouraged.

For purposes of this policy, an individual is a “responsible employee” when they have responsibility for another individual at NATS by performing functions including, but not limited to: teaching, counseling, grading, advising, evaluating, hiring, supervising, or making decisions or recommendations that confer with benefits such as promotions, financial aid awards or other remuneration, or that may impact upon other academic or employment opportunities.

V. RESOURCES

Overview

North American Trade Schools is committed to treating all individuals with dignity, care and respect. Any individual affected by sexual misconduct, whether a complainant, respondent or a third party, will have equal access to support and counseling services through NATS. NATS recognizes that any individual involved in an incident of sexual misconduct may have questions and we encourage NATS community members to seek the support of campus and community resources. NATS can provide guidance in making decisions, obtaining information about valuable resources and assisting either party in the event that a report and/or resolution is pursued. Individuals are encouraged to use all available resources, regardless of whether the incident occurred recently or in the past.

Complainants, respondents and third parties can expect:

- The opportunity to meet with the Title IX or Deputy Title IX Coordinator to answer questions regarding NATS's complaint processes for students and employees.
- Notice of confidential resources, including both health care and mental health counseling services, on campus and in the local community.
- Notice of the option to pursue law enforcement action and to be assisted by NATS officials in accessing and communicating with law enforcement authorities. This notice will include a discussion of the importance of preservation of evidence.
- The opportunity to request that NATS take the steps to prevent unnecessary or unwelcome contact or communication with another member of the NATS community.
- The right to be free from retaliation. Any concerns of retaliatory behavior should be immediately reported to the Title IX or Deputy Title IX Coordinator.

Confidential & Community Resources and Support

NATS encourages all NATS community members to report an incident of sexual misconduct. NATS recognizes, however, that there are many barriers to reporting, both individual and societal, and not every individual will choose to make a formal report with NATS or with local law enforcement. For those individuals who are not prepared to make a report, there are several confidential resources available for students, faculty and staff. Individuals seeking to talk to someone about an incident of sexual misconduct in a confidential manner without making a report to NATS or triggering any investigation or action by NATS may utilize the following resources. These resources hold a statutorily protected confidentiality that prohibits the release of an individual's information without that individual's express consent (except under limited circumstances that pose an imminent danger to the individual or others.) The following off-campus resources are confidential:

Maryland Crisis Intervention Hotline:

Dial 211

TurnAround, INC.
1800 North Charles Street
Suite 404
Baltimore, MD 21201
443-279-0379

Crisis Response Hotline (Baltimore County)
410-931-2214

Domestic Violence and Sexual Assault Hotline (Baltimore County and City)
410-857-0077

For Additional Information, online Maryland Community Services Locator
www.mdcsl.org

Campus Resources

In addition to the confidential resources listed above, all NATS community members have access to a variety of resources provided by NATS that can provide crisis intervention services, counseling, academic support and medical services. All of the staff listed below are trained to support individuals affected by sexual misconduct and to coordinate with the Title IX Coordinator consistent with NATS's commitment to a safe and healthy educational and work environment. While not bound by confidentiality, these resources will nevertheless maintain the privacy of an individual's information within the limited circle of those involved in the Title IX resolution process.

Title IX Coordinator

Matt Daly

Deputy Title IX Coordinators

Matt Mann

VI. REPORTING

All NATS employees, including faculty, staff, administrators and student employees who have a responsibility for student welfare are required to share with a member of the Title IX team any report of sexual misconduct they receive or of which they become aware.

All NATS community members, even those who are not obligated by this policy, are strongly encouraged to report information regarding any incident of sexual misconduct to a member of the Title IX team.

The Title IX team/coordinator will ensure that NATS responds to all reports in a timely, effective and consistent manner. The NATS Title IX team consists of the Title IX Coordinator and the Deputy Title IX Coordinators. The team is charged with the review, investigation and resolution of all reports to ensure consistent responsiveness and the integrated provision of interim measures to support the individuals involved and to protect the campus community. It is only through this consistent and informed

response that we create culture of accountability and break the culture of silence. The Title IX team is positioned to provide seamless support, assess campus safety and effectively respond to allegations of sexual misconduct.

NATS will promptly and thoroughly investigate and respond to all reports of sexual misconduct. NATS will respond to all reports in an integrated, consistent manner that treats each individual with dignity and respect. NATS will approach each report with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

NATS is committed to providing a variety of welcoming and accessible means so that all instances of sexual misconduct will be reported. NATS also recognizes that the decision whether or not to report sexual misconduct is personal, and that there are many barriers to reporting, both individual and societal. Not every individual will be prepared to make a report to NATS or to law enforcement, and individuals are not expected or required to pursue a specific course of action.

An incident does not have to occur on campus to be reported to NATS. Off-campus conduct that adversely affects NATS or the NATS community also falls under this policy.

An individual does not have to decide whether or not to request disciplinary action at the time the report is made. NATS recognizes that choosing to make a report, and deciding how to proceed after making the report, can be a process that unfolds over time. NATS will respect an individual's autonomy in making these important decisions and provide support that will assist each individual in making that determination.

As outlined in the Resources section of this policy, there are confidential community resources available to individuals not wishing to make a report to NATS. Information shared with these resources will not be reported to NATS.

As outlined in the Statement of Privacy, NATS respects the privacy interests of students, faculty and staff. All information reported will be shared only with those employees who assist in the investigation and/or resolution of the complaint.

Emergency/Immediate Reporting Options

NATS encourages all individuals to seek assistance from a medical provider and/or law enforcement immediately after an incident of sexual misconduct. This is the best option to ensure preservation of evidence and to begin a timely investigative and remedial response. NATS will assist any community member to get to a safe place and will provide transportation to the hospital, coordination of law enforcement and information about NATS's resources and complaint processes.

A medical provider can provide emergency and/or follow-up medical services, and the

ability to discuss any health concerns related to the incident in a confidential medical setting may bring peace of mind. The medical exam has two goals: first, and foremost, to diagnose and treat the full extent of any injury or physical effect; and second, to properly collect and preserve evidence. There is a limited window of time (typically 72 – 96 hours) following an incident of sexual assault to preserve physical and other forms of evidence. Taking the step to gather evidence immediately does not commit an individual to any course of action. The decision to seek medical attention and gather any evidence will remain confidential and preserve the full range of options to seek resolution through NATS's complaint processes or through the pursuit of criminal action.

Campus Reporting Options

NATS recognizes that a student or employee may choose to report sexual misconduct to *any* trusted employee of NATS. For example, a student may choose to confide in a faculty member, who is considered a "responsible employee" and who must report the incident under this policy. An employee may choose to confide in a supervisor, also considered a "responsible employee." Under this policy, *any* employee who receives a report of sexual misconduct must share the report with the Title IX Coordinator, as applicable, or a member of the Title IX team. The Title IX Coordinator and Title IX team are specifically charged with investigating and responding to allegations of sexual misconduct. Please refer to the Campus Resources section for a list of campus/Title IX contacts.

Anonymous Reporting

Any individual may make an anonymous report concerning an act of sexual misconduct. An individual may report the incident without disclosing his/her name, identifying the respondent or requesting any action. Depending on the level of information available about the incident or the individuals involved, however, NATS's ability to respond to an anonymous report may be limited.

False and Malicious Accusations

Members of the NATS community who make false and malicious complaints of sexual misconduct, as opposed to complaints which, even if erroneous, are made in good faith, will be subject to disciplinary action.

Time Frame for Reporting

Individuals are encouraged to report sexual misconduct immediately in order to maximize NATS's ability to respond promptly and equitably. NATS does not, however, limit the timeframe for reporting. NATS will not be able to pursue disciplinary action against an individual who is no longer affiliated with the institution.

Coordination with Law Enforcement

NATS encourages complainants to pursue criminal action for incidents of sexual misconduct that may also be crimes under State law. In every case of sexual violence, NATS, through the Title IX Coordinator, will notify the local law enforcement of the allegations. NATS will also assist a complainant in making a criminal report and will cooperate with law enforcement agencies if a complainant decides to pursue the criminal process to the extent permitted by law. However, a complainant may also choose not to pursue criminal action, and under most circumstances, the local law enforcement agency will not force the complainant to pursue charges if he/she/they are not willing to do so.

NATS's policy, definitions and burden of proof may differ from State criminal law. A complainant may seek resolution through NATS's complaint process, may pursue criminal action, may choose one but not the other, or may choose both. Neither law enforcement's determination whether or not to prosecute the respondent, nor the outcome of any criminal prosecution, are determinative of whether sexual misconduct under this policy has occurred.

Proceedings under NATS's Sexual Misconduct Policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus.

VII. INTERIM MEASURES

Upon receipt of a report, NATS will provide interim support and reasonable protective measures to prevent further acts of misconduct, and to provide a safe educational and work environment. NATS will determine the necessity and scope of any interim measures. Even when a complainant or respondent does not specifically request that protective action be taken, NATS may choose to impose interim measures at its discretion to ensure the safety of any individual, the NATS community or the integrity of the review process.

All individuals are encouraged to report concerns about failure of another individual to abide by any restrictions imposed by an interim measure. NATS will take immediate and responsive action to enforce measures previously ordered or implemented.

NATS may impose any remedy that can be tailored to the involved parties to achieve the goals of this policy, even if not specifically listed here. The range of interim measures may include:

- **No Contact Order:** A complainant or respondent may request, or NATS may impose, communication and contact restrictions to prevent further potentially harmful interaction. These communication and contact restrictions generally preclude in person, telephone, electronic or third party communications. In

some cases, an individual may also wish to consider an Abuse Prevention Order or Harassment Protection Order from the local courts. This is a civil proceeding independent of NATS. If a court order is issued, NATS will, to the extent possible, assist the protected person in benefitting from the restrictions imposed by the court and will also facilitate on-campus compliance with the order.

- **Academic or Employment Modifications:** A complainant or respondent may request an academic or employment accommodation after a report of sexual misconduct. An individual who requests assistance in changing their academic situation after an incident of sexual misconduct will receive appropriate and reasonably available accommodations. These may include:
    - Academic accommodations include changes in class schedule, taking an incomplete, dropping a course without penalty, attending a class online or other alternative means available or extending deadlines for assignments;
    - Change in work schedule or assignment;
    - Providing an escort to ensure safe movement between classes and activities.
- **Emotional Support:** NATS will provide referral services to off-campus agencies as detailed in the Confidential and Community Resources section of this policy.
- **Interim Support:** Where the report of sexual misconduct poses an ongoing risk of harm to the safety or well-being of an individual or members of the campus community, NATS may place an individual(s) on interim suspension or impose leave for an employee. Pending resolution of the complaint, the individual(s) may be denied access to the campus. When interim suspension or leave is imposed, NATS will make reasonable efforts to complete the investigation and resolution within an expedited time frame.

VIII. Title IX REVIEW

Role of the Title IX Coordinator

The Campus Director of North American Trade Schools has appointed one Title IX Coordinator. In their role as Title IX Coordinator, they oversee NATS's centralized review, investigation and resolution for reports of sexual misconduct. They also coordinate NATS's compliance with Title IX. The Title IX Coordinator is supported by the two Deputy Title IX Coordinators. Each is knowledgeable and trained in state and federal laws that apply to matters of sexual harassment, as well as NATS policy and procedure.

The Title IX and Deputy Title IX Coordinators can be contacted by telephone, email or in person during regular office hours. Please refer to the Campus Resources section of this policy for specific contact information.

The duties and responsibilities of the Title IX and Deputy Title IX Coordinators include training, education and climate checks, as well as the oversight of procedures that promptly and equitably eliminate sexual harassment, prevent its reoccurrence and address its effects on individuals and the NATS community. The Title IX and Deputy Title IX Coordinators will:

- Oversee the investigation and resolution of all reports of sexual misconduct;
- Meet with any individual, whether a complainant, respondent or third party to discuss interim measures, resources and procedural options on and off campus;
- Ensure prompt and equitable resolutions that comply with all requirements and timeframes specified in the complaint process;
- Conduct on-going and annual climate checks, tracking, and monitoring of sexual misconduct allegations on campus; and,
- Coordinate all training, education and prevention efforts.

Initial Assessment

NATS will address all reports of sexual misconduct. The Title IX or Deputy Title IX Coordinators will oversee the Title IX review process.

In every report of sexual misconduct, NATS, through the Title IX team member will make an initial assessment of any risk or harm to individuals or to the campus community and will take the steps necessary to address those risks. These steps will include the interim measures to provide for the safety of the individual and the campus community.

Investigation

The Title IX team member may determine if an investigation of the report of sexual misconduct should be conducted. This determination is based on a variety of factors, such as the complainant's wish to pursue disciplinary action, the risk posed to an individual or the campus community by not proceeding, and the nature of the allegation. The Title IX team member may designate an investigator of its choosing. Any investigator used by NATS, whether internal or external, must have specific training and experience investigating allegations of sexual misconduct.

The investigator will coordinate the gathering of information from the complainant, respondent and any other individuals who may have information relevant to the determination. The investigator will also gather any available physical or medical evidence, including documents, communications between the parties, and other electronic records, as appropriate. The investigator may also consider prior allegations of, or findings of responsibility for, sexual misconduct by the respondent. In gathering such information, the investigator will comply with all applicable laws and NATS policies. The investigation will be thorough, impartial and fair, and all individuals will be treated

with appropriate sensitivity and respect.

Information gathered during the investigation will be used to evaluate the responsibility of the respondent, provide for the safety of the individual and NATS's campus community, and impose the remedies as necessary to address the effects of the alleged conduct. Any investigative report will serve as the foundation for all related resolution processes.

Time Frame for Resolution

The investigation and resolution (including appeal) of all reports will generally be completed within sixty (60) to ninety (90) working days. Extenuating circumstances including the complexity and severity of a complaint may arise that require the complaint process to extend beyond that. In general, a complainant and respondent can expect to receive periodic updates as to the status of the review or investigation. In the event that the investigation and resolution exceed this time frame, NATS will notify all parties of the need for additional time and best efforts will be made to complete the process in a timely manner.

Applicability of Procedures

These procedures are applicable to all NATS campuses and subsidiaries. NATS reserves the right to modify this policy or the procedures at any time.

The procedures are intended to provide guidance to the Campus Directors for implementing NATS's sexual misconduct policy; these procedures do not create any rights or privileges on the part of any others.

Drug and Alcohol Information

I. POLICY ON ALCOHOLIC BEVERAGES

North American Trade Schools is firmly committed to providing our students with an exceptional quality of education and to providing our employees with a safe work environment. Employee or student involvement with illegal drugs or abuse of controlled substances is both against the law and an impediment toward meeting these commitments. NATS and its programs and policies regarding the possession, sale, or the consumption of alcoholic beverages encourages all students and employees to make safe, responsible decisions about alcohol that are consistent with existing state and federal law.

The possession, consumption, sale or furnishing of alcoholic beverages on campus by persons under the age of 21 is strictly prohibited by NATS and by the laws of the State of

Maryland. NATS provides programs that promote awareness of the physical, psychological, social and behavioral effect of alcohol consumption. It is a violation of the NATS Alcohol Policy for anyone to consume or possess alcohol in any public or private area of the campus without prior approval by school administration. In all circumstances, NATS expects its faculty, administrators, staff, students, alumni, and their respective guests to conduct themselves, both individually and collectively, in a responsible manner. Illegal, abusive, or excessive consumption of alcohol resulting in interference with the rights of other persons, personal injury, or damage to property will result in severe disciplinary action, up to and including suspension or expulsion.

Drug and Alcohol Abuse Prevention

Federal regulation requires an institution that participates in any Federal Student Aid program to provide information to its students, faculty, and employees to prevent drug and alcohol abuse. Current and prospective students will be informed at Orientation regarding campus security and Drug-Free campus information. Current and prospective students may request a copy of this information at any time from the Campus Director.

North American Trade Schools has developed a program to prevent the illicit use of drugs and the abuse of alcohol by students and employees. The program provides services related to drug use and abuse including dissemination of informational materials, educational programs, counseling services, referrals and college disciplinary actions.

Local, State & Federal Legal Sanctions

In all of its actions, North American Trade Schools seeks to uphold the laws of the jurisdictions in which it operates. Insofar as it is permitted by the laws of these political entities, including statutory and case law and the regulations of lawful agencies of these entities, the College will apply sanctions that could lead to a student being fined, suspended, expelled, or referred for prosecution for violations of NATS's standard of conduct. NATS will impose sanctions for actions that may or may not be violations of the law but are violations of the College's standards of conduct regarding illegal drugs and alcohol.

Standards of Conduct Regarding Alcohol

North American Trade Schools faculty, administrators, staff, and students recognize the responsibility and potential harm inherent in the use of alcoholic beverages. NATS is committed to supporting the laws of the United States and the State of Maryland and reflects that support in its policies and procedures.

The law of the State of Maryland concerning the use of alcoholic beverages reads as follows:

Section 6308 (a): A person commits a summary offense if he/she, being less than 21 years of age, attempts to purchase, purchases, consumes, possesses or knowingly and intentionally transports any alcohol, liquor or malt or brewed beverages.

Violation:

- Maximum penalty for first offense: $300 fine; 90 days imprisonment.
- Maximum penalty for subsequent offenses: $500 fine; 90 days imprisonment.
- Police are required to notify parents.
- Immediate suspension of vehicle operator license. First offense: 90-day suspension. Second offense: one-year suspension. Subsequent offenses: two-year suspension.

Section 6309 (a): A person is guilty of a misdemeanor of the third degree if he/she knowingly, willfully, and falsely represents to any licensed dealer or other person, any minor to be of full age, for the purpose of including any such licensed dealer or other person, to sell or furnish any liquor or malt or brewed beverages to a minor.

Violation:

- Maximum penalty: one-year imprisonment.
- Minimum penalty: $300 fine.

Section 6310.1 (a): A person commits a misdemeanor of the third degree if he /she intentionally and knowingly sells or intentionally and knowingly furnishes, or purchases with the intent to sell or furnish, any liquor or malt or brewed beverage to a person who is less than 21 years of age.

Violation:

- Maximum penalty: one-year imprisonment.
- Minimum penalty: $1,000 fine for first violation; $2,500 fine for subsequent violations.

Section 6310.6: Definitions: 'Furnish" to supply, give or provide to or allow a minor to possess on premises or property owned or controlled by the person charged.

Section 6310.7 (a): A person commits a summary offense if he/she intentionally and knowingly sells or furnishes nonalcoholic beverages to any person under 21 years of age.

Definition: "nonalcoholic beverages" means any beverage intended to be marketed or sold as nonalcoholic beer, wine, or liquor having some alcohol content but does not contain more than 0.5% alcohol by volume.

Violation:

- Maximum penalty: $300; 90-days imprisonment.

Liquor Code Title 47 Section 4-493.1, Unlawful act relative to liquor, malt and brewed beverages and licensees

It shall be unlawful –Furnishing liquor or malt or brewed beverages to certain persons

1. For any licensee or the board, or any employee, servant or agent of such licensee or of the board, or any other person, to sell, furnish or give any liquor or malt or brewed beverages, or to permit any liquor or malt or brewed beverages to be sold, furnished or given, to any person visibly intoxicated, or to any minor.

Health Risks Associated with the Use of Alcohol

Immediate Risks

- Increased risk of accidents and/or injuries
- Nausea
- Gastritis
- Vomiting
- Blackouts
- Unconsciousness
- Death by aspiration of vomitus
- Fatal overdose

Long-Term Risks

- Increased blood pressure
- Increased risk of heart attack
- Brain damage resulting in permanent psychosis
- Cancer of the mouth, esophagus or stomach
- Liver damage, such as cirrhosis, alcohol, hepatitis or cancer
- Ulcers and gastritis
- Pancreatitis
- Birth defects
- In males: testicular atrophy and breast enlargement
- In women: increased risk of breast cancer

Policy on Illegal Drugs

The use, possession, sale, manufacture, or distribution of narcotics and illicit drugs is illegal under both state and federal laws. Such laws are strictly enforced by local law

enforcement. Violators are subject to NATS disciplinary action, criminal prosecution, fine and imprisonment.

Standards of Conduct Regarding Illegal Drugs

Students and employees are required to adhere to North American Trade School's Drug-Free Workplace Policy and the Drug and Alcohol Policy, which strictly prohibits the unlawful manufacture, distribution, dispensation, sale, possession or use of drugs by its students and employees in the workplace.

No student shall attend school or employee shall report to work under the influence of drugs used in an unlawful manner. No student or employee shall unlawfully manufacture, distribute, dispense, possess, or use drugs on NATS property, as part of any NATS activities or while on duty as a NATS employee. Any NATS student or employee who violates this policy is subject to disciplinary action including suspension and dismissal.

The school reserves the right to carry out reasonable searches of employees, students, and their property, including, but not limited to backpacks, lockers, and private vehicles, if the vehicle is parked on school property or is parked in a designated parking area. For the purpose of this policy, the term "school property" shall include all land, buildings, structures, parking lots, designated parking areas, and means of transportation owned by or leased to North American Trade Schools. An employee or student who refuses to submit immediately to such a search may be discharged on the first offense.

Employees and students are prohibited from bringing drug paraphernalia on to school property at any time. An employee or student who possesses or distributes such paraphernalia while on school property shall be subject to disciplinary action, including discharge.

An employee or student who is arrested for, or convicted of, a drug offense which involves the off-duty sale, distribution, or possession with intent to distribute or manufacture illegal drugs must inform the school within five (5) days of the arrest, the nature of the charges, and the ultimate disposition of the charges. Failure to do so is grounds for disciplinary action, including discharge or expulsion. Such an arrest or conviction may also subject the employee or student to disciplinary action, including discharge or expulsion.

Applicable Federal and State Laws

The Federal Penalties and Sanctions for Illegal Possession of a Controlled Substance are as follows:

21 U.S.C. 844(a)

- First conviction: Up to one year imprisonment and fined at least $1,000 but not more than $100,000, or both.

- After one prior drug conviction: At least 15 days in prison, not to exceed two years and fined at least $2,500 but not more than $250,000, or both.
- After two or more prior drug conviction: At least 90 days in prison, not to exceed three years and fined at least $5,000 but not more than $250,000, or both.
- Special sentencing provisions for possession of crack cocaine: Mandatory at least five years in prison, not to exceed twenty years and fined up to $250,000, or both if:
    - First conviction and the amount of crack possessed exceed five grams.
    - Second crack conviction and the amount of crack possessed exceed three grams.
    - Third or subsequent crack conviction and the amount of crack possessed exceeds one gram.

21 U.S.C. 853(a) (2) and 881 (a) (7)
Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance if that offense is punishable by more than one-year imprisonment.

21 U.S.C. 881 (a) (4)
Forfeiture of vehicle, boats, aircraft or any other conveyance used to transport or conceals a controlled substance.

21 U.S.C. 844a
Civil fine of up to $10,000.

21 U.S.C. 853a
Denial of federal benefits, such as student loans, grants, contracts and professional and commercial licenses, up to one year for first offense, up to five years for second and subsequent offenses.

18 U.S.C. 922(g)
Ineligible to receive or purchase a firearm.

Miscellaneous
Revocation of certain federal licenses and benefits, for example, pilot license, public housing tenancy, etc., which are vested within the authorities of individual federal agencies.

Federal Drug Trafficking Penalties
Maryland Penalties and Sanctions
Misdemeanors:

1. Misrepresentation: It is unlawful for any person to acquire or obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception or subterfuge.
    a. Penalty: Imprisonment for one year, a fine of $5,000, or both.

2. Possession: It is unlawful for a person to knowingly or intentionally possess a controlled or counterfeit substance unless he/she is registered under the act or obtains the substance by use of a valid prescription.
    a. Penalty: In the case of a first offense, imprisonment for one year, a fine of $5,000, or both. In the case of a second offense, imprisonment for three years, a fine of $25,000, or both.
3. Possession and distribution of a small amount of marijuana (Thirty grams of marijuana or eight grams of hashish): It is unlawful for a person to possess a small amount of marijuana for personnel use; to possess it with intent to distribute it; or to distribute it.
    a. Penalty: Imprisonment for 30 days, a fine of $500, or both.
4. Use and delivery of paraphernalia: It is unlawful for a person to use, deliver or possess, with the intent of using or delivering, paraphernalia (such as grow kits, pipes, needles and roach clips) to grow, conceal or ingest drugs.
    a. Penalty: Imprisonment up to one year, a fine of $2,500, or both.

Felonies:

1. Delivery: It is unlawful for a person to manufacture, deliver or possess, with intent to manufacture or deliver, a controlled substance by a person not registered under this act.
    a. Penalty: In the case of most opiates, imprisonment for 15 years, a fine of $250,000, or both; in the cases of most hallucinogens, imprisonment for five years, and a fine of $15,000, or both; in the cases of most drugs available legally under prescription, imprisonment for three years, a fine of $10,000, or both.

Health Risks Associated with Drug Use

Marijuana and Hashish

- Chronic bronchitis
- Decreased vital capacity
- Increased risk of lung cancer
- In men: lower levels of sex hormone testosterone and an increase in abnormal sperm count

Stimulants (such as cocaine)

- Painful nosebleeds and nasal erosion
- Intense “downs” that result in physical and/or emotional discomfort
- Tolerance and physical dependence

Amphetamines (such as “speed” or “uppers”)

- Malnutrition
- Hallucinations
- Tolerance, psychological and sometimes physical dependence

Depressants (such as barbiturates, tranquilizers, methaqualone)

- Confusion, depression, loss of coordination
- Tolerance, physical and psychological
- Overdose causing coma and/or death
- Can be lethal when combined with alcohol

Hallucinogens (LSD, PCP, DMT, STP, mescaline)

- Hallucinations, panic, irrational behaviors (which can lead to increased risk of accidents, injuries)
- Overdose leading to convulsions, coma, and/or death
- Possible birth defects in children of LSD users

Narcotics (heroin, morphine, codeine, opium)

- Malnutrition
- Hepatitis
- Loss of judgment and self-control (which can lead to increased risk of accidents, injuries)
- Development of tolerance
- Overdose leading to convulsions, coma, and/or death

Deliriants

- Permanent damage to lungs, brain, liver, bone marrow
- Loss of coordination, confusion, hallucinations
- Overdose causing convulsions, and/or death

IV Drug Use

- Shared needles place one at risk for HIV infection (the virus that causes AIDS)

Nicotine

- Speeds up heartbeat
- Increases blood pressure
- Upsets the flow of blood and air in the lungs
- Causes drop in skin temperature in the fingers and toes

Campus Safety and Security Survey
Completion Certificate

The Campus Safety and Security data for

North American Trade Schools

(162371)

were completed and locked on **August 29, 2022**.

Thank you for your participation in the 2022 data collection.

This certificate was prepared on **August 29, 2022**

2022 Campus Safety and Security Survey

Institution: SAMPLE

Date ID: 2100277

SAVE | SAVE & CLOSE

Screening Questions

Please answer these questions carefully. The answers you provide will determine which screens you will be asked to complete for this data collection.

1. Does your institution provide On-campus Student Housing Facilities?

- **Yes**
- **No**: If this is selected, you must enter the number of student housing facilities below and enter the distance for each facility.

Number of On-campus Student Housing Facilities

2. Does your institution have any noncampus buildings or properties?

- **Yes**
- **No**

3. Were you confronted crimes that you received from the local or state police with your institution statistics for this report? If you answer No to this question, you will be asked to provide the data you received from the local and state police separately.

- **Yes**: Local and/or state law enforcement agencies provided us with crimes that we are combining with statistics collected by our campus security authority.
- **No**: We are not combining the statistics because we cannot determine whether the statistics we obtained from local and/or state law enforcement agencies are for our campus or for other locations or campuses.
- **Not applicable**: We cannot determine if the statistics we obtained from local and/or state law enforcement agencies are for our campus or for other locations or campuses.
- **Not Applicable**: We made a good faith effort to obtain statistics from local and/or state law enforcement agencies, but the agencies did not provide us with any statistics.

Criminal Offenses - On campus

For each of the following criminal offenses, enter the number reported to have occurred on Campus.

Criminal offense	Total occurrences On campus		
	2019	2020	2021
a. Murder/Non-negligent manslaughter	0	0	0
b. Manslaughter by Negligence	0	0	0
c. Rape	0	0	0
d. Fondling	0	0	0
e. Incest	0	0	0
f. Statutory rape	0	0	0
g. Robbery	0	0	0
h. Aggravated assault	0	0	0
i. Burglary	0	0	0
j. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0
k. Arson	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Criminal Offenses - Public Property

For each of the following criminal offenses, enter the number reported to have occurred on Public Property.

Criminal offense	Total occurrences on Public Property		
	2019	2020	2021
a. Murder/Non-negligent manslaughter	0	0	0
b. Manslaughter by Negligence	0	0	0
c. Rape	0	0	0
d. Fondling	0	0	0
e. Incest	0	0	0
f. Statutory rape	0	0	0
g. Robbery	0	0	0
h. Aggravated assault	0	0	0
i. Burglary	0	0	0
j. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0
k. Arson	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Hate Crimes - On campus

For the criminal offenses listed below, first enter the total number of Hate Crimes that were reported to have occurred on On campus. Then break down each bias by category of bias (e.g. race, religion, sexual orientation, etc.).

SAMPLE 2021

Criminal offense	Total	Occurrences of Hate Crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender identity	Disability	Ethnicity	National origin
a. Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
b. Rape	0	0	0	0	0	0	0	0	0
c. Fondling	0	0	0	0	0	0	0	0	0
d. Incest	0	0	0	0	0	0	0	0	0
e. Statutory rape	0	0	0	0	0	0	0	0	0
f. Robbery	0	0	0	0	0	0	0	0	0
g. Aggravated assault	0	0	0	0	0	0	0	0	0
h. Burglary	0	0	0	0	0	0	0	0	0
i. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
j. Arson	0	0	0	0	0	0	0	0	0
k. Simple assault	0	0	0	0	0	0	0	0	0
l. Larceny-theft	0	0	0	0	0	0	0	0	0
m. Intimidation	0	0	0	0	0	0	0	0	0
n. Destruction/damage/ vandalism of property	0	0	0	0	0	0	0	0	0

SAMPLE 2019

Criminal offense	Total	Occurrences of Hate Crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender identity	Disability	Ethnicity	National origin
a. Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
b. Rape	0	0	0	0	0	0	0	0	0
c. Fondling	0	0	0	0	0	0	0	0	0
d. Incest	0	0	0	0	0	0	0	0	0
e. Statutory rape	0	0	0	0	0	0	0	0	0
f. Robbery	0	0	0	0	0	0	0	0	0
g. Aggravated assault	0	0	0	0	0	0	0	0	0
h. Burglary	0	0	0	0	0	0	0	0	0
i. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
j. Arson	0	0	0	0	0	0	0	0	0
k. Simple assault	0	0	0	0	0	0	0	0	0
l. Larceny-theft	0	0	0	0	0	0	0	0	0
m. Intimidation	0	0	0	0	0	0	0	0	0
n. Destruction/damage/ vandalism of property	0	0	0	0	0	0	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Hate Crimes - Public Property

For the criminal offenses listed below, first enter the total number of Hate Crimes that were reported to have occurred on Public Property. Then break down each bias by category of bias (e.g. race, religion, sexual orientation, etc.).

SAMPLE 2021

Criminal offense	Total	Occurrences of Hate Crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender identity	Disability	Ethnicity	National origin
a. Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
b. Rape	0	0	0	0	0	0	0	0	0
c. Fondling	0	0	0	0	0	0	0	0	0
d. Incest	0	0	0	0	0	0	0	0	0
e. Statutory rape	0	0	0	0	0	0	0	0	0
f. Robbery	0	0	0	0	0	0	0	0	0
g. Aggravated assault	0	0	0	0	0	0	0	0	0
h. Burglary	0	0	0	0	0	0	0	0	0
i. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
j. Arson	0	0	0	0	0	0	0	0	0
k. Simple assault	0	0	0	0	0	0	0	0	0
l. Larceny-theft	0	0	0	0	0	0	0	0	0
m. Intimidation	0	0	0	0	0	0	0	0	0
n. Destruction/damage/ vandalism of property	0	0	0	0	0	0	0	0	0

SAMPLE 2019

Criminal offense	Total	Occurrences of Hate Crimes (Category of Bias for crimes)							
		Race	Religion	Sexual orientation	Gender	Gender identity	Disability	Ethnicity	National origin
a. Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
b. Rape	0	0	0	0	0	0	0	0	0
c. Fondling	0	0	0	0	0	0	0	0	0
d. Incest	0	0	0	0	0	0	0	0	0
e. Statutory rape	0	0	0	0	0	0	0	0	0
f. Robbery	0	0	0	0	0	0	0	0	0
g. Aggravated assault	0	0	0	0	0	0	0	0	0
h. Burglary	0	0	0	0	0	0	0	0	0
i. Motor vehicle theft (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
j. Arson	0	0	0	0	0	0	0	0	0
k. Simple assault	0	0	0	0	0	0	0	0	0
l. Larceny-theft	0	0	0	0	0	0	0	0	0
m. Intimidation	0	0	0	0	0	0	0	0	0
n. Destruction/damage/ vandalism of property	0	0	0	0	0	0	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

VAWA Offenses - On Campus

For each of the following crimes, enter the number reported to have occurred on Campus.

Crime	Total occurrences On Campus		
	2019	2020	2021
a. Domestic violence	0	0	0
b. Dating violence	0	0	0
c. Stalking	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

VAWA Offenses - Public Property

For each of the following crimes, enter the number reported to have occurred on Public Property.

Crime	Total occurrences on Public Property		
	2019	2020	2021
a. Domestic violence	0	0	0
b. Dating violence	0	0	0
c. Stalking	0	0	0

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Arrests - On campus

Enter the number of Arrests for each of the following crimes that occurred On Campus.

Crime	Number of Arrests		
	2019	2020	2021
a. Weapons: carrying, possessing, etc.	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0

Please Note: Do NOT include Drunkenness or driving under the influence or liquor law violations.

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Arrests - Public Property

Enter the number of Arrests for each of the following crimes that occurred on Public Property.

Crime	Number of Arrests		
	2019	2020	2021
a. Weapons: carrying, possessing, etc.	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0

Please Note: Do NOT include Drunkenness or driving under the influence or liquor law violations.

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Disciplinary Actions - On Campus

Enter the number of persons referred for disciplinary action for crimes that occurred on Campus for each of the following categories.
(This information refers to the number of persons referred for disciplinary action, not to the number of arrests.)
(If no disciplinary action is the result of an arrest, please do not count it here, count the violations, not 1 arrest)

Crime	Number of persons referred for Disciplinary Action		
	2019	2020	2021
a. Weapons: carrying, possessing, etc.	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0

Please Note: Do NOT include Drunkenness or driving under the influence or liquor law violations.

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Disciplinary Actions - Public Property

Enter the number of persons referred for disciplinary action for crimes that occurred on Public Property for each of the following categories.
(This information refers to the number of persons referred for disciplinary action, not to the number of arrests.)
(If no disciplinary action is the result of an arrest, please do not count it here, count the violations, not 1 arrest)

Crime	Number of persons referred for Disciplinary Action		
	2019	2020	2021
a. Weapons: carrying, possessing, etc.	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0

Please Note: Do NOT include Drunkenness or driving under the influence or liquor law violations.

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA

Unfounded Crimes

Of those crimes that occurred On Campus, On campus Student Housing Facilities, or in Noncampus property or buildings, and on Public Property, enter the number of crimes that were unfounded.

Unfounded crimes are all reported crimes should include all criminal offenses, hate crimes, domestic violence, dating violence, or stalking incidents that have been unfounded. Arrests and disciplinary referrals cannot be unfounded.

	Number
Total unfounded crimes	0

Please Note: 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.

Count unfounded crimes in the year in which they were originally reported.

Caveat:
If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: The 2018VL Line 2B now changed from 20 to 25 because 2BVAWA