

GOLDFARB

GOLDFARB SCHOOL OF NURSING AT BARNES-JEWISH COLLEGE



2016-2017 Annual Security Report

BARNES JEWISH
College
Goldfarb School of Nursing
BJC HealthCare



2016

ANNUAL SECURITY REPORT

GOLDFARB SCHOOL OF NURSING AT BARNES-JEWISH COLLEGE

ANNUAL SECURITY REPORT

Introduction

This report is provided in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as amended. It provides students and employees of Goldfarb School of Nursing at Barnes-Jewish College ("Goldfarb" or "College") with information on: the College's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the College will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

Policy for Preparing the Annual Report

This report is prepared by Barnes-Jewish Hospital's Department of Public Safety in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities, faculty, and staff. Each year an e-mail notification is sent to all enrolled students that provides the web site to access this report. Faculty and staff receive similar notifications. Hard copies of the report may also be obtained at no cost by contacting Dr. Michael Ward, Vice Dean for Student Affairs and Diversity.

Goldfarb is committed to taking the actions necessary to provide a safe and secure working and learning environment for all students and staff. As a member of the campus community, know that Goldfarb has worked hard to implement procedures benchmarked as best practices in the field.

Policies Concerning The Law Enforcement Authority of Campus Security Personnel

Barnes-Jewish Hospital and the Missouri Baptist Medical Center Departments of Public Safety are responsible for campus security at the College. Their jurisdiction covers all campus property. The Department of Public Safety handles all calls for service, traffic enforcement and accident investigation, and their officers are licensed public safety officers that have full arrest authority. The Department of Public Safety has a working relationship with local law enforcement agencies, including the Metropolitan St. Louis Police Department, which, when necessary, assists the Department of Public Safety.

Contact information for BJH Department of Public Safety

Michael Lauer
Executive Director
Department of Public Safety of Support Services and Public Safety
mrl2530@bjc.org
314.362-0220

Contact information for Missouri Baptist Medical Center Department of Public Safety

Susan Steele
Security Manager
slh0894@bjc.org
314.996-5253

Other Officials to Whom Crimes May Be Reported

The College also has designated other officials to serve as additional campus security authorities. Reports of criminal activity can also be made to these officials. They in turn will ensure the reports are recorded with the Department of Public Safety for collection as part of the College's annual report of crime statistics. These additional campus security authorities are:

Title IX Coordinator
Dr. Michael Ward
mward@bjc.org
314-362-9155

Title IX Deputy Coordinator
Dr. June Cowell-Oates
jcowell-oates@bjc.org
314-454-8694

Vice Dean for Finance and Administration
314-454-8515

Academic Advisors

Jessica Allen - Duncan Campus site
Jxa1084@bjc.org
(314) 362-7295

Janine Russell - Duncan Campus site
Janine.Russell@bjc.org
(314) 362-3623

Academic Support Advisor - West Campus site
(314) 996-7437

Duncan Campus First Floor Security desk
(314) 454-7555

West Campus Site Security Dispatcher
(314) 996-4770

Policies on Reporting a Crime or Emergency

The College encourages accurate and prompt reporting of all criminal actions, accidents, injuries, or other emergencies occurring on campus to the Department of Public Safety and appropriate police agencies even when the victim of a crime elects not to do so or is unable to make such a report. Such reports should be made as follows:

- Situations that pose imminent danger, or if a crime is in progress, should be reported to local law enforcement by calling **911** from any campus phone or cell phone. Keep in mind that the individual making the call from a cell phone will need to provide the address where the

emergency has occurred. After making the 911 call, also make a report to one of the campus security authorities identified above.

- Students, staff, and visitors should report criminal actions, accidents, injuries, or other emergency incidents to one of the campus security authorities identified above. Once reported, the individual making the report will be encouraged to also report it to appropriate police agencies. If requested, a member of the College staff will assist a student in making the report to the police.
- Anonymous incident reports can also be made.

To the extent permitted by law, the College will protect the confidentiality of victims.

Any victim of a crime who does not want to pursue action within the College disciplinary system or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. With the victim's permission, a report of the details of the incident can be filed without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps the College take appropriate steps to ensure the future safety of the victim and others. With such information, the College can keep an accurate record of the number of incidents involving students, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the College.

For students or staff who seek counseling from pastoral counselors or professional licensed counselors through the Employee Assistance program or Student Assistance program, confidentiality is maintained unless otherwise dictated by the victim or state or federal law. For all other confidential reporters, non-identifying, statistical disclosure is provided unless state law requires a report.

The College has no officially recognized student organizations with off-campus locations. However, if criminal activity occurs while students are attending school sponsored events or training off campus, the reporting procedures are the same as those stated above.

Additionally, upon written request, the College will disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by this institution against a student who is the alleged perpetrator of such a crime or offense. If the alleged victim is deceased as a result of such a crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

Goldfarb seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. A description of those programs and their frequency of presentation follows:

- A one-time campus security update is provided during the New Student Orientations for students as they enter their program of study. Additional information related to campus security and general safety can be found in the Student Handbook. Students are provided Title IX training as a part of their on-boarding after admitted to the College

- Security and safety procedures are discussed with new and continuing students and staff within individual departments of the school at the beginning of term by way of “safety updates” found on the GSON website. This includes encouraging students to be alert to security situations and to assist the school in preventing crimes from occurring through awareness and communication.
- Employees and students are informed about the prevention of crimes through written communication from school management, via campus postings, email distribution, or internet posting.

Building Security

Goldfarb is a private institution and reserves the right to restrict access and movement on its grounds to staff, students, patients, visitors, and others who are conducting business on site. The security of the College’s building involves patrols 24 hours a day, 7 days a week by the Department of Public Safety staff. Also, the interior and exterior of the College building is secured with closed circuit TV monitors. The buildings are accessible by students and staff with a current identification badge. On the Duncan campus, visitors without an ID badge are permitted entry on an individual basis by the security attendant. On West campus, visitors without an ID badge must report to the Administrative Coordinator.

Students and employees are asked to be alert and to not circumvent practices and procedures that are meant to preserve their safety and that of others:

- Do not prop doors open or allow strangers into secure campus buildings
- Do not lend keys or access cards to non-students
- Do not leave keys or access cards unattended
- Do not give others building access codes

Keys to the offices, laboratories, and classrooms on campus will be issued to employees only as needed and after receiving proper authorization. Each department supervisor is responsible for assuring his/her area is secured and locked.

Employees must adhere to policies regarding unauthorized access to school facilities, theft of, or damage to, school property, or other criminal activity. In particular, rendering inoperable or abusing any fire prevention or detection equipment is prohibited. Violation of these policies may lead to disciplinary action, up to and including termination and the filing of charges with law enforcement authorities.

Employee and student identification cards may be used to verify the identity of persons suspected to be in campus facilities without permission.

Timely Warnings

In the event of criminal activity occurring on campus or off campus that, in the judgment of the Vice Dean for Finance and Administration or designee, constitutes an ongoing or continuing threat, a campus-wide “timely warning” will be issued. After information concerning incidences of ongoing or continued threats to students or employees at the College, medical center, or immediately surrounding areas, is received from the Department of Public Safety, email and/or text message warnings will be communicated to students and employees. This same message will be posted to GUSConnect, the notification used at the Missouri Baptist (West Campus) location, and posted in individual classrooms if necessary. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to the Department of Public Safety.

Emergency Response and Evacuation Procedures

The College has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to: tornadoes, bomb threats, chemical spills, disease outbreaks, or armed intruders. Goldfarb works with local police and the Department of Public Safety to handle situations that warrant an emergency response. Students, staff and visitors are encouraged to notify the local police, Department of Public Safety or Vice Dean for Finance and Administration or designee of any situation that poses such a threat. If an officer with the Department of Public Safety is contacted about an emergency, he or she will notify the Vice Dean for Finance and Administration or designee.

The Vice Dean for Finance and Administration will access available sources from campus administrative staff and local authorities to confirm the existence of the danger and will be responsible for initiating and coordinating the College's response, including notifying the appropriate local emergency response authorities for assistance. Depending on the nature of the emergency, other College departments may be involved in the confirmation process.

Once the emergency is confirmed, the College community, or appropriate segments of it, will be notified. The Vice Dean for Finance and Administration or designee on the Duncan campus site and the Administrator on Call on the West campus site, in collaboration with other appropriate personnel, will determine who should be notified and will, without delay, and 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 responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

The Vice Dean for Finance and Administration or designee will direct the issuance of emergency notifications, which will be accomplished using the RAVE system (for both Duncan and West campuses). For messages specific to the West Campus only, the Everbridge system is in place. The Administrator on Call is responsible for issuance of emergency notifications that are specific to the Missouri Baptist Medical Center. The Vice Dean for Finance and Administration or designee will collaborate with Administrator on Call at the West Campus if joint messages are necessary.

- Upon admission to the college, every student is required to complete an information sheet that identifies multiple contact numbers. This information will be maintained in the system as long as the student is in active status. Changes to any of the contact numbers should be reported to the college immediately to insure up to date information.
- All employees of the college, upon hire, will complete the information sheet. It is the responsibility of the individual to inform the college of any changes to their contact numbers.
- Student and employee contact information is updated by the College's Information System Department when changes occur.

The RAVE and Everbridge systems are notification systems that provide multiple methods of communications with students, faculty and staff. Upon activation of the systems each individual will receive notice on their cellular telephone, land line telephone, a text message on their cellular telephone and an email message to their identified email account. Specific alerts have been developed for:

1. Campus Lockdown - A serious situation is occurring or precautionary steps are being taken to restrict access to the college campus.
2. Emergency Alert - A situation is occurring that requires immediate attention by all personnel.
3. Tornado Warning - A tornado or severe thunderstorm warning is in place for the immediate college area.
4. Weather Closing - Due to weather conditions the college is closing or will be closed for the next day.
5. Power Outage - There is a power outage at the college or medical center.

Specific information related to each of these alerts will be included in the message. There will also be an all clear notice sent for the lockdown, emergency and tornado warnings.

The Administrator on Call at the West Campus site will activate the "Everbridge" system in cases of emergency, including campus lockdown, emergency alert, tornado warning, etc.

If the Vice Dean for Finance and Administration at the Duncan Campus site is unable to address the emergency situation, then one of the following will be the responsible party for the College:

- Dean of College
- Director of Information Services
- Vice Dean for Student Affairs and Diversity
- Senior Associate Dean for Academic Affairs

The RAVE and Everbridge emergency notification systems will be tested at least once per calendar year or more often if it is deemed necessary. This test will include a message that the system is being activated with a test message. A follow-up email message will be sent to each student, faculty and staff informing them a test of the system was conducted on a particular date and time and if the test message was not received, they should contact the Vice Dean for Finance and Administration or Administrator on Call. Anyone stating they did not receive a test message will have their emergency contact numbers confirmed and update in the system if necessary.

Also, at various times the Emergency Management Team will meet to train and test and evaluate the College's emergency response plan. The Vice Dean for Finance and Administration maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the College will distribute to its students and employees information to remind them of the College's emergency response and evacuation procedures.

Policy, Procedures and Programs Related to Various Sex-Related Offenses

Consistent with the requirements of Title IX of the Education Amendments of 1972, the College prohibits discrimination based on sex in its educational programs and activities, including sexual harassment and acts of domestic violence, dating violence, sexual violence and stalking. The College also prohibits any retaliation, intimidation, threats, coercion or any other discrimination against any individuals exercising their rights or responsibilities pursuant to this policy. A full statement of the College's Title IX policy and the procedures for filing, investigating and resolving complaints for violations of that policy may be found at <http://gson-ne.ws/2j> (use the table of contents to find the section addressing "Title IX Policies").

The following discusses the College's educational programs to promote the awareness of domestic violence, dating violence, sexual assault and stalking; provides information concerning procedures students should follow if they become a victim of one of these offenses; and advises students of services available in the event they do become a victim.

Educational Programs to Promote Awareness and Prevention of These Offenses:

Goldfarb prohibits the offenses of domestic violence, dating violence, sexual assault and stalking. The following definitions apply within the state of Missouri:

- *Consent*: Consent or lack of consent may be expressed or implied. Assent does not constitute consent if:
 - (a) It is given by a person who lacks the mental capacity to authorize the conduct charged to constitute the offense and such mental incapacity is manifest or known to the actor; or
 - (b) It is given by a person who by reason of youth, mental disease or defect, intoxication, a drug-induced state, or any other reason is manifestly unable or known by the actor to be unable to make a reasonable judgment as to the nature or harmfulness of the conduct charged to constitute the offense; or
 - (c) It is induced by force, duress or deception.

See Section 556.061(5), RSMo.

- *Domestic Assault (Violence)*: This offense can be committed in degrees (1st, 2nd or 3rd) depending on the seriousness of the injury inflicted or attempted to be inflicted. It occurs when a person attempts to cause or knowingly causes the injury to a family or household member, including any child who is a member of the family or household. "Family or household member" means spouses, former spouses, any person related by blood or marriage, persons who are presently residing together or have resided together in the past, any person who is or has been in a continuing social relationship of a romantic or intimate nature with the victim and anyone who has a child in common regardless of whether they have been married or have resided together at any time.

See Sections 455.010(7), 565.072, 565.073, and 565.074, RSMo.

- *Dating Violence*: This is not separately defined in Missouri law, but note that the definition above relating to Domestic Assault would also encompass violence between those in a dating

relationship. For further guidance, the Violence Against Women Act states that the existence of such a relationship is determined based on a consideration of the length of it, the type of relationship and the frequency of interaction between the persons involved in the relationship.

- *Stalking:*

1. As used in this definition, the following terms shall mean:

(1) "Course of conduct", a pattern of conduct composed of two or more acts, which may include communication by any means, over a period of time, however short, evidencing a continuity of purpose. Constitutionally protected activity is not included within the meaning of course of conduct. Such constitutionally protected activity includes picketing or other organized protests;

(2) "Credible threat," a threat communicated with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety, or the safety of his or her family, or household members or domestic animals kept at such person's residence or on such person's property. The threat must be against the life of, or a threat to cause physical injury to, or the kidnapping of, the person, the person's family, or the person's household members or domestic animals kept at such person's residence or on such person's property;

(3) "Harasses", to engage in a course of conduct directed at a specific person that serves no legitimate purpose that would cause a reasonable person under the circumstances to be frightened, intimidated, or emotionally distressed.

2. A person commits the crime of stalking if he or she purposely, through his or her course of conduct, harasses or follows with the intent of harassing another person.

3. A person commits the crime of aggravated stalking if he or she purposely, through his or her course of conduct, harasses or follows with the intent of harassing another person, and:

(1) Makes a credible threat; or

(2) At least one of the acts constituting the course of conduct is in violation of an order of protection and the person has received actual notice of such order; or

(3) At least one of the actions constituting the course of conduct is in violation of a condition of probation, parole, pretrial release, or release on bond pending appeal; or

(4) At any time during the course of conduct, the other person is seventeen years of age or younger and the person harassing the other person is twenty-one years of age or older; or

(5) He or she has previously pleaded guilty to or been found guilty of domestic assault, violation of an order of protection, or any other crime where the other person was the victim.

See Section 565.225, RSMo.

The majority of sexual offenses that occur on campus communities are committed by people known by their victims. Often, these types of assaults are not reported to police or campus authorities because people do

not think this unwanted sexual contact constitutes sexual assault since they know the assailant. These assailants, however, are able to continue to exploit people by manipulating that trust. By reporting these incidents, you will significantly decrease the likelihood that this individual can subject another person to this type of victimization.

The following are warning signs of abusive behavior, the recognition of which will help mitigate the likelihood of perpetration, victimization or bystander inaction:

- If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:
 - Make your limits known before going too far.
 - You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
 - Try to remove yourself from the physical presence of a sexual aggressor. Be as direct as possible about wanting to leave the environment.
 - Grab someone nearby and ask them for help.
 - Be responsible about your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
 - Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
 - Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.
 - It is also important to be aware of the warning signs of an abusive person. Some examples include:
 - Past abuse
 - Threats of violence or abuse
 - Breaking objects
 - Using force during an argument
 - Jealousy
 - Controlling behavior
 - Quick involvement
 - Unrealistic expectations
 - Isolation
 - Blames others for problems
 - Hypersensitive
 - Cruelty to animals or children
 - “Playful” use of force during sex
 - Jekyll-and-Hyde personality
- If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:
 - Remember that you owe sexual respect to the other person.
 - Don’t make assumptions about the other person’s consent or about how far they are willing to go.
 - Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
 - If your partner expresses a withdrawal of consent, stop immediately.
 - Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you their intentions.

- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is intoxicated or on drugs, even if they knowingly and intentionally put themselves in that state.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

Individuals are encouraged to take safe and positive steps to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault or stalking against another person. This includes reporting such incidents to appropriate authorities. Other steps that can be taken include:

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- Don’t hesitate to contact the police.

The College provides primary prevention and awareness programs for new students and employees. The following is a description of them:

- Students are provided a link during their New Student Orientation that allows them to view a 45 minute video on Title IX information, after which they take a short multiple choice quiz over the information. Faculty and staff are provided annual training during planned events each year. The date for this training is posted on the College Calendar.

The College also provides ongoing prevention and awareness campaigns for all students and employees. The following is a description of them:

- Student training is provided during New Student Orientation and again via the Title IX video that is accessed, after students have attended New Student Orientation, from a link that is provided to each student. Other reference documents include the Student Handbook (available on the College website) and periodic “safety updates” for employees and students each term.

Restraining Orders

Any student or employee who has a restraining order, order of protection, no contact order or any other such order issued by a court against another individual (whether or not that individual is also a student or employee of the College) is highly encouraged to notify a campus security authority of the threat and to provide a copy of the restraining order so that it is kept on file with the Department of Public Safety and can be enforced, if necessary. The College will assist in the pursuit and enforcement of such orders if necessary and will work with the victim to make necessary and reasonable safety accommodations. For assistance with such processes and in notifying law enforcement on-campus or off-campus, contact the Department of Public Safety.

Procedures to Follow if You are a Victim of a Sex Offense:

If you are a victim of a sexual assault, go to a safe place and call 911 or the Department of Public Safety. Additionally, notify the College's Title IX Coordinator, Dr. Michael Ward, 314-362-9155 or mward@bjc.org, or Deputy Title IX Coordinator, Dr. June Cowell-Oates, 314-454-8694 or jCowell-Oates@bjc.org. If requested by the victim, the College will assist the victim in notifying appropriate law enforcement authorities of the assault, although the victim also has the option to decline to make such notification.

It is imperative that victims of sexual assault, dating violence, and domestic violence try to preserve evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action, or in obtaining a protection order. Therefore, victims should follow these guidelines:

- Do not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence.
- Do not bathe or wash, or otherwise clean the environment in which the assault occurred.
- Options for pressing charges can be deferred, if you will go to the local hospital emergency room and ask for an exam and for evidence of the sexual assault to be collected and sealed.

Victims of stalking should also preserve evidence of the crime to the extent possible. In cases of stalking, evidence is more likely to be in the form of letters, emails, text messages, etc. rather than evidence of physical contact and violence.

Available Victim Services:

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, financial aid assistance, and other services available to them, both within the College and in the surrounding community. Those services include: the Employee Assistance Program (314) 729-4030 or Student Assistance Program (888) 505-6444.

The College will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations to the extent the College has control over those environments. The College will also provide information on how to request protective measures. If victims request these accommodations, and they are reasonably available, they will be provided, regardless of whether the victim chooses to report the crime to campus security or local law enforcement. Moreover, the College will maintain as confidential any accommodations or protective measures provided to a victim to the extent permitted by law and where maintaining confidentiality would not impair the College's ability to provide them. If the College believes it is necessary to disclose personal information in order to provide an accommodation, it will attempt to advise the victim before making the disclosure.

To request an accommodation described above or any other protective measure, the victim should contact: Dr. Michael Ward, Title IX Coordinator, mward@bjc.org or Dr. June Cowell-Oates, Deputy Title IX Coordinator, jcowell-oates@bjc.org.

Procedures for Disciplinary Action:

Allegations of domestic violence, dating violence, sexual assault or stalking will be processed through the College's Title IX Policies and Procedures, available at: <http://gson-ne.ws/2j> (search the table of contents for the section addressing Title IX policies and procedures).

The Title IX Policies and Procedures are utilized whenever a complaint is made, regardless of the status of the complainant and respondent. The complaint resolution procedures are invoked once a complaint is made to the Title IX Coordinator, and all College employees have a duty to report such incidents to Dr. Michael Ward, Title IX Coordinator or Dr. June Cowell-Oates, Deputy Title IX Coordinator or his/her designee when they become aware of them.

Once a complaint is made, the Title IX Coordinator, or designee, will commence an investigation as soon as practicable but not later than seven (7) days after the complaint is made. During the investigation, the complainant and respondent will each have an equal opportunity to describe the situation and present witnesses and other supporting evidence. Upon completion of the investigation, the Title IX Coordinator, or designee, will make a decision and issue a written report to the complainant and respondent with findings and, if necessary, attach an addendum with sanctions and remedial measures that will be implemented. The College strives to complete investigations of this nature within sixty (60) calendar days.

Both parties have an equal opportunity to appeal decisions of the Title IX Coordinator or designee to the President and Dean. The President and Dean will resolve the appeal within fifteen (15) days of receiving it and may take any and all actions that he/she determines to be in the interest of a fair and just decision.

Both the victim and the individual accused of the offense are entitled to:

- A prompt, fair and impartial investigation and resolution.
- A proceeding conducted by officials who at a minimum receive annual training on the issues related to domestic violence, dating violence, sexual assault and stalking and on how to conduct an investigation that protects the safety of victims and promotes accountability.
- The same opportunities to have others present during any meeting or proceeding, including the opportunity to be accompanied by the advisor of their choice. The College may not limit the choice of advisor, but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
- Have the outcome determined using a preponderance-of-the-evidence standard based on the totality of the evidence presented.
- Simultaneous, written notification of the outcome of the proceeding, any procedures for either party to appeal the result, any change to the result and when the result becomes final. The notification will include the rationale for the result and any sanction imposed.

Possible Sanctions or Protective Measures that the College May Impose for Domestic Violence, Dating Violence, Sexual Assault or Stalking Offenses:

Following a final determination in the College's disciplinary proceeding that one of the above offenses has been committed, the College may impose a range of penalties depending on the mitigating and aggravating circumstances involved. They include, but are not limited to: no-contact orders, classroom or clinical reassignment, the provision of counseling or other support services, training, and discipline for the perpetrator, including suspension, probation, and expulsion.

Victims to Receive Written Notification of Rights:

When a student or employee reports to the College that he or she has been a victim of domestic violence, dating violence, sexual assault, or stalking, whether the offense occurred on or off campus, the College will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

Sex Offender Registration Program

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting Michael Lauer, Director of Public Safety, Barnes-Jewish Hospital, (314) 362-0220 or mrl2530@bjc.org.

The Missouri State Highway Patrol maintains a general registry of sex offender information, which may be accessed at the following link:

<http://www.msHP.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>.

The Missouri State Police maintains a general registry of sex offender information, which may be accessed at the following link:

<http://www.isp.state.il.us/sor/sor.cfm>

Alcohol and Other Drugs Policy

Goldfarb School of Nursing at Barnes-Jewish College (“GSON”) seeks to maintain an atmosphere conducive to the pursuit of learning and to a healthy and wholesome social environment. GSON considers its students to be adults who will comply with its AOD policy and federal, state, and local law regulating alcohol and drug use. Any student who violates this policy will be subject to the full range of correction action, up to and including academic dismissal. It is the intent of GSON through its policy, procedures, and practices to reduce the potential for:

- a. The manufacture, possession, use, sale, distribution, dispensation, receipt, or transportation of illegal substances while on GSON property or while otherwise engaged in GSON business.
- b. The theft, unauthorized use, intentional mishandling or misuse of any medication and/or substance that is present at GSON.
- c. The consumption of alcoholic beverages while at school or performing school activities.
- d. Being under the influence of substances while on GSON property or while otherwise engaged in GSON business.
- e. In addition, the Drug Free Schools and Communities Act of 1989 requires any institution of higher learning receiving federal funds to certify that it has adopted a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students.

DEFINITIONS:

- a. Student: The term student refers to all GSON students and all students enrolled in courses at the College.
- b. Illegal Drug: Any drug which is (1) not legally obtainable, (2) legally obtainable but has been illegally obtained by the student, or (3) a prescribed drug legally obtained, but not being used for prescribed purposes, or being used in a dosage other than that prescribed.

c. Possession: To have on one's person, in one's personal effects, in one's vehicle or otherwise under one's care, custody, or control.

d. Substance: Any alcohol, drugs, other substances whether ingested, inhaled, injected, or otherwise administered, that have mind altering or function-altering effects upon the human body or that impair one's ability to safely perform his or her work, specifically including, but not limited to, prescription drugs and over-the-counter medications; alcohol, drugs, and other substances made illegal under federal or state law.

e. Premises: For the purpose of this policy all property, facilities, buildings, structures, installations, work locations, work areas, or vehicles owned, operated, leased, or under the control of GSON, one of its clinical and community-based rotation sites, or one of its health service organizations to which such premises or property pertains. Private vehicles parked on premises or properties are also included under this definition.

f. Under the Influence: The condition wherein any of the body's sensory, cognitive, physical appearance, motor functions or capabilities is altered, impaired, diminished, or affected due to substances. This also means the detectable presence of substances within the body, regardless of when or where they may have been consumed.

g. Prescription: A valid prescription issued to an individual by a licensed health care provider authorized to issue such prescription and used for its intended purpose as prescribed before any expiration date.

h. Health Care Provider: Health Care Providers include: licensed clinical staff including physicians, nurses, and other allied health professionals; students, including graduate medical students, who provide direct patient care under the supervision of licensed clinical staff.

POLICY:

The illegal possession, distribution, or use of drugs by students on GSON property is not permitted and will subject violators to the appropriate action up to and including academic dismissal. Any individual engaging in prohibited conduct under this policy is also subject to legal action. GSON students are expected to promptly report to a College Administrator any suspicion of another student being under the influence.

Students are permitted to take legally prescribed and/or over-the-counter medications consistent with appropriate medical treatment plans. However, when such prescribed or over-the-counter medications affect the student's performance, the safety of fellow students, faculty/staff, patients, or members of the public, the College Administration should be consulted to determine if the student is fit for duty.

PRE-ADMISSION DRUG TESTING:

All applicants will be screened for the use of illegal drugs and the illegal use of prescribed drugs at a lab of GSON's choice and expense. The applicant will be required to take a substance test after an offer of admission has been made. No applicant may begin classes until a substance test yielding negative results has been completed. Re-admitted students will be drug screened regardless of time lapse between end of enrollment and re-admission. Offers of admission are contingent upon the results of substance abuse testing of breath, saliva, urine, blood, and/or hair in accordance with this policy. For individuals to whom a contingent offer of admission has been extended, and who test positive on a drug screen, the offer of admission will be rescinded. Offers of admission will also be rescinded and applicants will no longer be considered for admission for any of the following reasons:

- a. Refusal to execute the required consent/release form.
- b. Refusal to submit to the drug test.
- c. Failure to show up to take the test, unless the absence is due to emergent circumstances that can be substantiated.
- d. Failure to remain at the test site or cooperate until testing is complete.
- e. Any attempted substitution, dilution, or adulteration of the specimen.
- f. Urine specimen not within normal temperature range.
- g. Applicants who receive a conditional offer and fail a pre-admission substance test will not be considered again for admission for six (6) months.

When an applicant tests positive for the use of illegal drugs or the illegal use of prescribed drugs, a medical review officer will contact the applicant to rule out the influence of prescribed and/or over the counter medications. The use of prescribed drugs that may influence test results will require supporting documentation from the prescribing physician. Negative test results from a test completed prior to the application process with GSON will not be accepted.

POST-ADMISSION DRUG TESTING:

Once a student has completed all admissions testing requirements, they may be subject to additional substance at any time under the following circumstances:

- a. Post-accident testing.
- b. Missing substances – for any student who has access to controlled substances and a medication administration/handling discrepancy or missing substance exists. Students who admit to or who are found diverting medications will be dismissed.
- c. Fitness for duty – students suspected to be unfit for duty.
- d. Reasonable suspicion – if a reasonable belief that a student is under the influence exists, or a credible anonymous tip that includes specific details is received.
- e. Campus searches – College Administrators may conduct searches of GSON property, including lockers, and a student's personal property when any of these are on GSON property; therefore, there is no expectation of privacy. College Administrators may also at any time inspect any vehicle on GSON property if the administrator/faculty/staff member has reasonable cause to believe that the vehicle is involved in the use, storage, distribution or sale of alcohol or illegal drugs.

PROCESS FOR DRUG TESTING:

- a. A student who appears to be under the influence of substance(s), in the sole discretion of GSON, will be removed from the campus and provided with transportation to the place of testing. GSON will call the emergency contact indicated by the student or, if unavailable, arrange for a cab or other means to transport the student home following the test.

- b. Refusal to submit to the substance test shall be grounds for immediate academic dismissal.
- c. Following completion of a substance test, student will be suspended. If test results are negative, the student will be reinstated. If the test results are positive, the student will be subject to immediate academic dismissal.
- d. Specimens reported by the testing laboratory as adulterated or substituted will be considered a refusal to test, and therefore grounds for immediate academic dismissal or ineligibility for admission.
- e. All test results will be handled on a confidential basis and will be available only to GSON personnel who have a need to know such results. The College Administration will determine who will have access to these records.
- f. Confidential drug and alcohol counseling, in addition to information, education, assessment and referral, is available through the Student Assistance Program (SAP).

OFF-PREMISE USE:

Students who are convicted of any substance related violation under state or federal law or who plead guilty or no contest to such charges must inform the College Administration in writing within five (5) days of the conviction or plea; failure to do so will result in disciplinary action, up to and including academic dismissal. In the event of a student's conviction or plea to charges relating to the manufacture, possession, sale, use, distribution, dispensation, receipt, or transportation of any substance, College administration will determine whether disciplinary action will be taken, including the appropriateness of continued enrollment.

The College Administration will report such conviction or plea to the appropriate federal agencies as required by the Safe and Drug-Free Schools and Communities Act of 1989.

STUDENT SELF-DISCLOSURE:

GSON will attempt to assist students by providing information and/or access to drug or alcohol rehabilitation resources. However, the decision to seek diagnosis and accept treatment for drug or alcohol abuse is the individual student's responsibility.

Students who voluntarily disclose a drug/alcohol problem to a College Administrator or voluntarily seek assistance prior to exhibiting performance issues or being asked to submit to for cause testing will be given the opportunity to seek treatment without jeopardizing their enrollment.

No student will be dismissed solely as a result of seeking counseling and rehabilitation.

REPORTING REQUIREMENTS

Under this policy, GSON will report any student or health care provider who is dismissed (or who withdraws in lieu of dismissal) for violating the provisions of this policy to the appropriate regulatory and licensing agencies as required.

Crime Statistics

The Clery Act requires institutions of higher education to disclose crime statistics covering the previous three years on various crimes and offenses. The definitions of these offenses, consistent with FBI guidelines and the Violence Against Women Act reauthorization of 2013 regulations, are as follows:

Murder and non-negligent homicide: The willful (non-negligent) killing of one human being by another.

Negligent manslaughter: The killing of another person through gross negligence.

Sex offenses

1. *Rape:* The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
2. *Fondling:* The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
3. *Incest:* Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
4. *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 from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury, usually accompanied by the use of a weapon or by a means likely to produce death or great bodily harm.

Burglary: The unlawful entry of a structure to commit a felony or a theft.

Motor vehicle theft: The theft or attempted theft of a motor vehicle.

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

Domestic violence: Violent misdemeanor and felony offenses committed by the victim's current or former spouse, current or former cohabitant, and person similarly situated under domestic violence law, or anyone else protected under domestic or family violence law.

Dating violence: Violence by a person who has been in a romantic or intimate relationship with the victim. Whether there was such a relationship will be gauged by its length, type and frequency of interaction.

Stalking: A course of conduct directed at a specific person that would cause a reasonable person to fear for her, his or others' safety, or to suffer substantial emotional distress.

Hate crimes involve those crimes motivated by the following biases: race, gender, religion, sexual orientation, ethnicity, disability, national origin, and gender identity. Hate crimes include those defined above that were motivated by one or more of these biases. They also include the following crimes and offenses:

Larceny-theft: The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. Constructive possession is the condition in which a person does not have physical custody or possession, but is in a position to exercise dominion or control over a thing.

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

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

Destruction/damage/vandalism of property: Willfully or maliciously destroying, damaging, defacing, or otherwise injuring real or personal property without the consent of the owner or the person having custody or control of it.

Statistics must also be disclosed related to arrests and referrals for disciplinary action for violations of law relating to weapons, drugs or liquor. For this purpose, the following definitions apply:

Arrest: A person processed by arrest, citation or summons.

Referral for disciplinary action: The referral of any person to any official who initiates a disciplinary action of which a record is kept and which may result in the imposition of a sanction.

The statistical summary of the above crimes and offenses for this campus over the past three calendar years follows in the attached appendix.

APPENDIX

CRIME DATA STATISTICS – 2016

INSTITUTION: MAIN CAMPUS (177719001)

(Includes Duncan and West Campus Data)

2016 Campus Safety and Security Survey

Institution: Main Campus (177719001)
User ID: C1777191

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?

- No.
 Yes. (If Yes is selected, you must enter the number of student housing facilities below and enter Fire Statistics for each facility.)

Number of On-campus Student Housing Facilities:

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

- Yes No

3. Have you combined statistics 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 statistics that we are combining with statistics collected by our campus security authorities.
 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 on-campus incidents or public property incidents.
 Not available. We cannot determine if the statistics we obtained from local and/or state law enforcement agencies are for our Clery geography.
 Not available. We made a good-faith effort to obtain statistics from local and/or state law enforcement agencies, but the agencies did not comply with our request.

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		
	2013	2014	2015
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	0		
d. <u>Rape</u>		0	0
e. <u>Fondling</u>		0	0
f. <u>Sex offenses - Non-forcible</u>	0		
g. <u>Incest</u>	0	0	0
h. <u>Statutory rape</u>	0	0	0
i. <u>Robbery</u>	0	0	0
j. <u>Aggravated assault</u>	0	0	0
k. <u>Burglary</u>	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0
m. <u>Arson</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Criminal Offenses - Noncampus

For each of the following criminal offenses, enter the number reported to have occurred in or on Noncampus buildings or property.

Criminal offense	Total occurrences in or on Noncampus buildings or property		
	2013	2014	2015
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	0		
d. <u>Rape</u>		0	0
e. <u>Fondling</u>		0	0
f. <u>Sex offenses - Non-Forcible</u>	0		
g. <u>Incest</u>	0	0	0
h. <u>Statutory rape</u>	0	0	0
i. <u>Robbery</u>	0	0	0
j. <u>Aggravated assault</u>	0	0	0
k. <u>Burglary</u>	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0
m. <u>Arson</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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		
	2013	2014	2015
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Negligent manslaughter</u>	0	0	0
c. <u>Sex offenses - Forcible</u>	0		
d. <u>Rape</u>		0	0
e. <u>Fondling</u>		0	0
f. <u>Sex offenses - Non-forcible</u>	0		
g. <u>Incest</u>	0	0	0
h. <u>Statutory rape</u>	0	0	0
i. <u>Robbery</u>	0	0	0
j. <u>Aggravated assault</u>	0	0	0
k. <u>Burglary</u>	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	1	0
m. <u>Arson</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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 campus. Then break down each total by category of bias (e.g., race, religion).

Occurrences of Hate crimes

Category of Bias for crimes reported in 2015

Criminal offense	2015 Total	Category of Bias for crimes reported in 2015								
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0	
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0	
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0	
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0	
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0	
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0	
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0	
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0	
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0	
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0	
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0	
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0	
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0	
q. <u>Destruction/damage/vandalism of property</u>	0	0	0	0	0	0	0	0	0	

Occurrences of Hate crimes

Category of Bias for crimes reported in 2014

Criminal offense	2014 Total	Category of Bias for crimes reported in 2014								
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0	
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0	
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0	
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0	
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0	
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0	
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0	
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0	
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0	
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0	
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0	
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0	
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0	
q. <u>Destruction/damage/vandalism of property</u>	0	0	0	0	0	0	0	0	0	

Occurrences of Hate crimes

Category of Bias for crimes reported in 2013

Criminal offense	2013 Total	Category of Bias for crimes reported in 2013						
		Race	Religion	Sexual orientation	Gender	Disability	Ethnicity/ National origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	
c. <u>Sex offenses - Forcible</u>	0	0	0	0	0	0	0	
<u>Sex offenses - Non-forcible</u>	0	0	0	0	0	0	0	
g. <u>Incest</u>	0	0	0	0	0	0	0	
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	
i. <u>Robbery</u>	0	0	0	0	0	0	0	
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	

k. <u>Burglary</u>	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u>	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0
<u>larceny-theft</u>	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0
q. <u>Destruction/damage/ vandalism of property</u>	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:
"For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Hate Crimes - Noncampus

For the criminal offenses listed below, first enter the total number of Hate Crimes that were reported to have occurred in on Noncampus buildings or property. Then break down each total by category of bias (e.g., race, religion).

Occurrences of Hate crimes

Category of Bias for crimes reported in 2015

Criminal offense	2015 Total	Category of Bias for crimes reported in 2015							
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National origin
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0
q. <u>Destruction/damage/ vandalism of property</u>	0	0	0	0	0	0	0	0	0

Occurrences of Hate crimes

Category of Bias for crimes reported in 2014

Criminal offense	2014 Total	Category of Bias for crimes reported in 2014							
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National origin
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0
q. <u>Destruction/damage/ vandalism of property</u>	0	0	0	0	0	0	0	0	0

Occurrences of Hate crimes

Category of Bias for crimes reported in 2013

Criminal offense	2013 Total	Category of Bias for crimes reported in 2013					
		Race	Religion	Sexual orientation	Gender	Disability	Ethnicity/ National origin
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0
c. <u>Sex offenses - Forcible</u>	0	0	0	0	0	0	0
<u>Sex offenses - Non-forcible</u>	0	0	0	0	0	0	0
g. <u>Incest</u>	0	0	0	0	0	0	0
h. <u>Statutory rape</u>	0	0	0	0	0	0	0
i. <u>Robbery</u>	0	0	0	0	0	0	0
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0

k. <u>Burglary</u>	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u>	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0
<u>Simple assault</u>	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0
q. <u>Destruction/damage/ vandalism of property</u>	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: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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 total by category of bias (e.g., race, religion).

Occurrences of Hate crimes

Criminal offense	2015 Total	Category of Bias for crimes reported in 2015								
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0	0
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0	0
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0	0
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0	0
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0	0
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0	0
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0	0
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0	0
q. <u>Destruction/damage/vandalism of property</u>	0	0	0	0	0	0	0	0	0	0

Occurrences of Hate crimes

Criminal offense	2014 Total	Category of Bias for crimes reported in 2014								
		Race	Religion	Sexual orientation	Gender	Gender Identity	Disability	Ethnicity	National origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	0	0	0
d. <u>Rape</u>	0	0	0	0	0	0	0	0	0	0
e. <u>Fondling</u>	0	0	0	0	0	0	0	0	0	0
g. <u>Incest</u>	0	0	0	0	0	0	0	0	0	0
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	0	0	0
i. <u>Robbery</u>	0	0	0	0	0	0	0	0	0	0
j. <u>Aggravated assault</u>	0	0	0	0	0	0	0	0	0	0
k. <u>Burglary</u>	0	0	0	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	0	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0	0	0	0
q. <u>Destruction/damage/vandalism of property</u>	0	0	0	0	0	0	0	0	0	0

Occurrences of Hate crimes

Criminal offense	2013 Total	Category of Bias for crimes reported in 2013						
		Race	Religion	Sexual orientation	Gender	Disability	Ethnicity/ National origin	
a. <u>Murder/ Non-negligent manslaughter</u>	0	0	0	0	0	0	0	
.. <u>Sex offenses - Forcible</u>	0	0	0	0	0	0	0	
.. <u>Sex offenses - Non-forcible</u>	0	0	0	0	0	0	0	
g. <u>Incest</u>	0	0	0	0	0	0	0	
h. <u>Statutory rape</u>	0	0	0	0	0	0	0	
i. <u>Robbery</u>	0	0	0	0	0	0	0	

j. <u>Aggravated assault</u>	0	0	0	0	0	0	0
k. <u>Burglary</u>	0	0	0	0	0	0	0
l. <u>Motor vehicle theft</u>	0	0	0	0	0	0	0
m. <u>Arson</u>	0	0	0	0	0	0	0
n. <u>Simple assault</u>	0	0	0	0	0	0	0
o. <u>Larceny-theft</u>	0	0	0	0	0	0	0
p. <u>Intimidation</u>	0	0	0	0	0	0	0
q. <u>Destruction/damage/ vandalism of property</u>	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: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

VAWA Offenses - On Campus

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

Crime	Total occurrences On Campus		
	2013	2014	2015
a. <u>Domestic violence</u>		0	0
b. <u>Dating violence</u>		0	0
c. <u>Stalking</u>		0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

VAWA Offenses - Noncampus

For each of the following crimes, enter the number reported to have occurred in or on Noncampus buildings or property.

Crime	Total occurrences in or on Noncampus buildings or property			
	2013	2014	2015	
a. <u>Domestic violence</u>			0	0
b. <u>Dating violence</u>			0	0
c. <u>Stalking</u>			0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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		
	2013	2014	2015
a. <u>Domestic violence</u>		0	0
b. <u>Dating violence</u>		0	0
c. <u>Stalking</u>		0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Arrests - On campus

Enter the number of Arrests for each of the following crimes that occurred On Campus.
DO NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Number of Arrests		
	2013	2014	2015
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Arrests - Noncampus

Enter the number of Arrests for each of the following crimes that occurred in or on Noncampus buildings or property.
DO NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Number of Arrests		
	2013	2014	2015
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Arrests - Public Property

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

NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Number of Arrests		
	2013	2014	2015
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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.

Do not include disciplinary actions that were strictly for school policy violations.

If the disciplinary action is the result of an arrest, please do not count it here; count the violation as 1 arrest.

Do NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Number of persons referred for Disciplinary Action		
	2013	2014	2015
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Disciplinary Actions - Noncampus

Enter the number of persons referred for disciplinary action for crimes that occurred in or on Noncampus buildings or property for each of the following categories.

Do not include disciplinary actions that were strictly for school policy violations.

If the disciplinary action is the result of an arrest, please do not count it here; count the violation as 1 arrest.

Do NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	2013	Number of persons referred for Disciplinary Action		
		2014	2015	
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0	0
b. <u>Drug abuse violations</u>	0	0	0	0
c. <u>Liquor law violations</u>	0	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

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.

Do not include disciplinary actions that were strictly for school policy violations.

If the disciplinary action is the result of an arrest, please do not count it here; count the violation as 1 arrest.

Do NOT include drunkenness or driving under the influence in Liquor law violations.

Crime	Number of persons referred for Disciplinary Action		
	2013	2014	2015
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	0
c. <u>Liquor law violations</u>	0	0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

Unfounded Crimes

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

The total number of unfounded crimes should include all criminal offenses, hate crimes, domestic violence, dating violence, or stalking incidents that have been unfounded. Arrests and disciplinary actions cannot be unfounded.

If a reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is "unfounded". Only sworn or commissioned law enforcement personnel may unfound a crime.

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

	2013	Number 2014	2015
a. <u>Total unfounded crimes</u>		0	0

Caveat:

If you have changed prior years' data, you must add a caveat explaining the change. Use the following format: "For (YEAR), Line (X) was changed from (A) to (B) because (REASON)."

2016

INSTITUTION INFORMATION – REGISTRATION

2016 Campus Safety and Security Survey

Institution Information

Institution: Main Campus (177719001)

User ID: C1777191

Registration

Required fields are indicated with asterisks ().

Barnes-Jewish College Goldfarb School of Nursing (Main Campus) (177719001)	
First Name*	Michael
Last Name*	Lauer
Title*	Executive Director, Support Svcs and Public Safety
Address 1*	4353 Clayton Ave Suite 141
Address 2	
City*	ST LOUIS
State*	Missouri
Zip*	63110 - <input type="text"/>
Phone*	314 - 362 - 0220
Extension	<input type="text"/>
Fax	314 - 362 - 0761
E-mail Address*	mrl2530@bjc.org
Confirm E-mail Address*	<input type="text"/>
Comment	* Please use this box if you would like to provide additional contact information such as a cell phone number or the best time to reach you if there are questions about your survey. Also, if the person listed above is not the person who enters the data, please provide the name and contact information for the person who enters the data. This information is for the survey help desk staff only. It will not be seen by the public. <input type="text"/>

Identification

Please enter/review all applicable information. Required fields are indicated with asterisks (*).

Institution Information

Institution Name	Barnes-Jewish College Goldfarb School of Nursing
Address	4483 Duncan Avenue Saint Louis, MO 63110
Web Address	http://www.barnesjewishcollege.edu
Chief Administrative Officer's Name*	Gretchen Drinkard
Chief Administrative Officer's Title*	Interim Dean
Chief Administrative Officer's E-mail Address*	mbleich@bjc.org
Telephone*	314 - 454 - 7057 Ext. <input type="text"/>

Campus Information

Campus Name*	Main Campus
Description	<input type="text"/>
Location*	<input checked="" type="radio"/> State or Outlying Area <input type="radio"/> Other Country
Address*	4483 Duncan
City*	SAINT LOUIS
State or Outlying Area*	Missouri
ZIP Code*	63110 - <input type="text"/>
County	ST LOUIS

Campus Safety Officer

Name*	Michael Lauer
Title*	Executive Director, Support Svcs and Public Safety
Location*	<input checked="" type="radio"/> State or Outlying Area <input type="radio"/> Other Country <input type="checkbox"/> Address same as campus
Address*	4353 Clayton Ave Suite 120
City*	ST LOUIS
State or Outlying Area*	Missouri
ZIP Code*	63110 - <input type="text"/>
Telephone*	314 - 362 - 0220 Ext. <input type="text"/>
Email Address*	mrl2530@bjc.org

Campus Fire Safety Officer

Name*	Michael Lauer
Title*	Director of Public Safety
Location*	<input checked="" type="radio"/> State or Outlying Area <input type="radio"/> Other Country <input type="checkbox"/> Address same as campus
Address*	4353 Clayton Ave Suite 120
City*	ST LOUIS
State or Outlying Area*	Missouri
ZIP Code*	63110 - <input type="text"/>
Telephone*	314 - <input type="text"/> 362 - <input type="text"/> 0220 Ext. <input type="text"/>
E-mail Address*	mrl2530@bjc.org

Lead Title IX Coordinator

Name*	Dr. Michael Ward
Title*	Vice Dean for Student Affairs and Diversity
Location*	<input checked="" type="radio"/> State or Outlying Area <input type="radio"/> Other Country <input type="checkbox"/> Address same as campus
Address*	4483 Duncan
City*	St. Louis
State or Outlying Area*	Missouri
ZIP Code*	63110 - <input type="text"/>
Telephone*	314 - <input type="text"/> 362 - <input type="text"/> 6289 Ext. <input type="text"/>
Email Address*	MWard@bjc.org
Does your Institution have other designees who share these responsibilities? *	<input type="radio"/> Yes <input checked="" type="radio"/> No

Update Status

Date Completed	8/23/2016
Update Status	Updated

2016
REGISTRATION CERTIFICATE

Campus Safety and Security Survey Completion Certificate

The Campus Safety and Security data for
Barnes-Jewish College Goldfarb School of Nursing
177719

were completed and locked on September 12, 2016.

Thank you for your participation in the 2016 data collection.

This certificate was prepared on September 12, 2016.



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

August 2015

Dear Chief Executive Officer:

Institutions of postsecondary education that participate in the Federal student financial assistance programs have been required by section 485(f) of the Higher Education Act of 1965, otherwise known as the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), to provide the Secretary with campus crime statistics since 1990 and with fire statistics since the Higher Education Opportunity Act (Public Law 110-315) (HEOA) was enacted on August 14, 2008, reauthorizing the Higher Education Act of 1965, as amended.

On March 7, 2013, President Obama signed the Violence Against Women Reauthorization Act of 2013 (VAWA) (Pub. Law 113-4), which, among other provisions, amended the Clery Act to require institutions to compile and disclose statistics for incidents of domestic violence, dating violence, sexual assault, and stalking and to include certain policies, procedures, and programs pertaining to these incidents in their annual security reports (ASRs). The U.S. Department of Education (Department) published final regulations to implement the VAWA changes on October 20, 2014. Those final regulations have been effective since July 1, 2015. In July 2015, we issued a Dear Colleague Letter GEN-15-15 to provide an overview of the requirements of the regulations and of the changes to the Campus Safety and Security Survey. We have enclosed that letter for your convenience.

Campus Safety and Security Survey

Under the Clery Act, institutions must provide crime and fire statistics for the prior three years to the Department. As in prior years, your institution must provide this data through a Web-based system that can be accessed only by a designated member of your staff. We strongly urge you to appoint someone who is familiar with campus safety and security procedures to serve in this capacity as the Campus Safety Survey Administrator (CSSA) and to forward the enclosed materials and instructions to that person promptly.

For your convenience, the name of your institution's CSSA for last year's collection is shown on the enclosed Registration Certificate along with the new ID and password for this year. The CSSA may enlist the aid of other staff members to complete the survey. However, all communications for this survey will go to the CSSA and that person will be responsible for your institution's data submission during the August 19, 2015, to October 14, 2015, collection period. This includes confirming its accuracy, and "locking" the data for transmission to the Department. Once your institution's data have been reviewed, they will be made available to the general public at <http://ope.ed.gov/security>.

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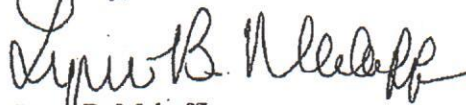
Page 2 – Chief Executive Officer

Remember, providing this information is required as a condition of your institution's continued participation in the Federal student financial assistance programs. To ensure the timeliness of this survey, we will contact you again if your CSSA does not register promptly once the website opens on August 19, 2015.

If you need any additional information or have any questions, please contact the survey Help Desk by phone at 1-800-435-5985 or by e-mail at campussafetyhelp@westat.com.

Thank you in advance for your assistance in this important task.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn B. Mahaffie". The signature is fluid and cursive, written over the printed name.

Lynn B. Mahaffie
Deputy Assistant Secretary for
Policy, Planning, and Innovation

Enclosures



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

July 2015

Dear Campus Safety Survey Administrator:

You are receiving this letter because your institution's Chief Executive has designated you as the Campus Safety Survey Administrator (CSSA), the person responsible for completing the 2015 Campus Safety and Security Survey which will be conducted from August 19, 2015, through October 14, 2015. The survey will collect data about the number and nature of crimes and fires on your institution's campus(es) for the 2014 calendar year. Providing this information is required under section 485 of the Higher Education Act of 1965 (HEA), as amended, as a condition of your institution's continued participation in the Federal student financial assistance programs.

Changes to the Campus Safety and Security Survey

As you may know, on March 7, 2013, President Obama signed the Violence Against Women Reauthorization Act of 2013 (VAWA) (Pub. Law 113-4), which, among other provisions, amended the Clery Act to require institutions to compile and disclose statistics for incidents of domestic violence, dating violence, sexual assault, and stalking and to include certain policies, procedures, and programs pertaining to these incidents in their annual security reports (ASRs). The U.S. Department of Education (Department) published final regulations to implement the VAWA changes on October 20, 2014. Those final regulations have been effective since July 1, 2015.

In July 2015, we issued a Dear Colleague Letter GEN-15-15 to provide an overview of the requirements of the regulations and of the changes to the Campus Safety and Security Survey. As explained in this letter, institutions were expected to include 2013 statistics for domestic violence, dating violence, sexual assault, and stalking in their 2014 ASRs. To ease burden on institutions, the 2015 Campus Safety and Security Survey will collect these data beginning with 2014 calendar year statistics. In addition, the final regulations require institutions to report how many crimes are found to be "unfounded" in both the 2015 ASRs and the 2015 Campus Safety and Security Survey, beginning with 2014 calendar year statistics. Institutions will also be required to report the contact information for their lead Title IX coordinator in the 2015 Campus Safety and Security Survey.

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Accessing the Campus Safety and Security Survey

As in prior years, the survey will be administered through a Web-based system that can be accessed only by you (or your designee) using the 2015 user ID and password shown on the enclosed Registration Certificate. Once the website opens on August 19, 2015, please log in and register immediately so that we know you have received the access information. Please enter or update your contact information carefully because it will be used for all further contact with you during this data collection. As the CSSA, you are responsible for assuring the accuracy of your institution's data. Once the data are entered, you are also responsible for locking the survey so that the data can be reviewed and later made available to the public on the Department of Education's website located at <http://ope.ed.gov/security>.

To assist you in your reporting responsibilities, the following guidance resources are available:

- The Handbook for Campus Safety and Security Reporting, available at <http://www.ed.gov/admins/lead/safety/campus.html>.
- Campus Safety and Security Training, a video companion to the handbook also available at <http://www.ed.gov/admins/lead/safety/campus.html>.
- The web survey User's Guide which provides step-by-step instructions for each page of the survey and is available at <https://surveys.ope.ed.gov/security/>.

If you need any additional information or have any questions, please contact the survey Help Desk by phone at 1-800-435-5985 or by e-mail at campussafetyhelp@westat.com. With your help we anticipate achieving a 100 percent response rate by the close of data collection again this year. I appreciate your cooperation and effort in this endeavor and I look forward to working with you.

Sincerely,



Lynn B. Mahaffie
Deputy Assistant Secretary for
Policy, Planning, and Innovation



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF POSTSECONDARY EDUCATION

July 22, 2015

GEN-15-15

Subject: Implementation of the VAWA Final Regulations

Summary: This letter summarizes the final regulations implementing statutory changes to the Clery Act.

Dear Colleague:

On March 7, 2013, President Obama signed the Violence Against Women Reauthorization Act of 2013 (VAWA) (Pub. Law 113-4), which, among other provisions, amended section 485(f) of the Higher Education Act of 1965, as amended, 20 U.S.C. §1092(f), otherwise known as the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). In May 2013, the U.S. Department of Education (Department) initiated a negotiated rulemaking process to develop regulations to implement the amendments to the Clery Act made by VAWA. The negotiated rulemaking committee held three negotiating sessions in January, February, and March of 2014. Ultimately, the committee reached consensus on a set of draft regulations. The Department published a Notice of Proposed Rulemaking for public comment on June 20, 2014, and after completing its review of the comments received, it published final regulations on October 20, 2014. Those final regulations, which will appear in 34 CFR 668.46, went into effect July 1, 2015.

The preamble to the NPRM noted that the changes made to the Clery Act by VAWA did not affect in any way Title IX of the Education Amendments of 1972 (Title IX), its implementing regulations, or associated guidance issued by the Department's Office for Civil Rights (OCR). Nothing in the Clery Act, as amended by VAWA, alters or changes an institution's obligations or duties under Title IX as interpreted by OCR.

Below is a list of the major changes that have been made to the Clery Act regulations and information regarding the 2015 Campus Safety and Security Survey, the instrument that institutions of higher education use to report campus crime statistics to the Department. Note that this letter provides only an overview of the changes made to the regulations and to the Campus Safety and Security Survey. Detailed information is provided in the final regulations, and screenshots of the 2015 Campus Safety and Security Survey that will be available through the survey website in early August. Institutions should review both of these documents to ensure compliance with the new requirements.

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Summary of the Major Changes to the Clery Act Regulations

The final regulations--

- Require institutions to collect and report information regarding incidents of dating violence, domestic violence, sexual assault, and stalking that occur on an institution's Clery Geography and are reported to a Campus Security Authority or to local law enforcement agencies;
- Require institutions to disclose statistics of such incidents in their Annual Security Reports (ASRs) and the Campus Safety and Security Survey and to maintain credible documentation that substantiates the institution's crime statistics;
- Require institutions to have policies and procedures for victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the institution's crime statistics;
- Clarify the very limited circumstances in which an institution may remove reports of crimes that have been "unfounded" by law enforcement officials and require institutions to report to the Department and disclose in the ASR the number of crimes that were "unfounded" and subsequently withheld from their crime statistics;
- Revise the definition of "rape" to reflect the Federal Bureau of Investigation's (FBI) updated definition in the Uniform Crime Reporting (UCR) Summary Reporting System, which encompasses the categories of rape, sodomy, and sexual assault with an object that are used in the UCR National Incident-Based Reporting System;
- Revise the categories of bias for the purposes of Clery Act hate crime reporting to add gender identity and to separate ethnicity and national origin into different categories;
- Require institutions to provide information on culturally relevant, inclusive prevention awareness programs to incoming students and new employees, as well as describe these programs in their ASRs. These programs must include: a statement that the institution prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking; the definitions of these terms in the applicable jurisdiction; the definition of "consent," in reference to sexual activity, in the applicable jurisdiction; a description of safe and positive options for bystander intervention; information on risk reduction; and information on the institution's policies and procedures after a sex offense occurs;
- Require institutions to provide, and describe in their ASRs, ongoing prevention and awareness campaigns for students and employees. These campaigns must

include the same information as the institution's primary prevention and awareness program;

- Define the terms "awareness programs," "bystander intervention," "ongoing prevention and awareness campaigns," "primary prevention programs," and "risk reduction";
- Require institutions to describe each type of disciplinary proceeding used by the institution in cases of alleged dating violence, domestic violence, sexual assault, or stalking; the steps, anticipated timelines, and decision-making process for each type of disciplinary proceeding; how to file a disciplinary complaint; how the institution determines which type of proceeding to use based on the circumstances of an allegation of dating violence, domestic violence, sexual assault, or stalking; and the standard of evidence that will be used during the disciplinary proceeding;¹
- Require institutions to list all of the possible sanctions that the institution may impose following the results of any institutional disciplinary proceedings for an allegation of dating violence, domestic violence, sexual assault, or stalking;
- Require institutions to describe the range of protective measures that the institution may offer following an allegation of dating violence, domestic violence, sexual assault, or stalking;
- Require institutions to provide students or employees who report being victims of dating violence, domestic violence, sexual assault or stalking with a written explanation of their rights and options, regardless of whether the offense occurred on campus, including written notification of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims both within the institution and in the community, and the availability of changes to academic, living, transportation, and working situations, or protective measures regardless of whether the victim reports to law enforcement;
- Require institutions to provide for a prompt, fair, and impartial disciplinary proceeding in cases of alleged dating violence, domestic violence, sexual assault, or stalking in which: (1) officials are appropriately trained and do not have a conflict of interest or bias for or against the accuser or the accused; (2) the accuser and the accused have equal opportunities to have others present, including an advisor of their choice; (3) the accuser and the accused receive simultaneous notification, in

¹ An institution of higher education can comply with both Title IX and the Clery Act by using a preponderance of evidence standard in disciplinary proceedings regarding title IX complaints and by disclosing this standard in the ASR required by the Clery Act.

writing, of the result of the proceeding and any available appeal procedures; (4) the proceeding is completed in a reasonably prompt time frame; (5) the accuser and accused are given timely notice of meetings at which one or the other or both may be present; and (6) the accuser, the accused, and appropriate officials are given timely and equal access to information that will be used during informal and formal disciplinary meetings and hearings;

- Define the terms "proceeding" and "result"; and
- Specify that compliance with these provisions does not constitute a violation of section 444 of the General Education Provisions Act (*20 U.S.C. 1232g*), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA).

2014 ASRs and Statistics for the 2013 Calendar Year

For their 2014 ASRs, institutions were required to make a good-faith effort to include incidents of dating violence, domestic violence, sexual assault, and stalking in the crime statistics for calendar year 2013. Institutions also were required to make a good-faith effort to ensure that the statistics for the new crime categories were accurate and complete in their ASRs with the understanding that institutions may not have complete statistics for 2013.

The 2015 Campus Safety and Security Survey

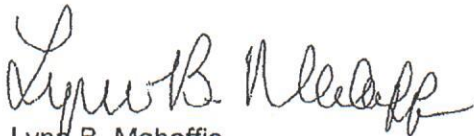
The Clery Act requires institutions to disclose and report crime statistics for the three most recent calendar years. As we have done in the past, we will phase in the new statistical requirements by collecting data until three years are represented, beginning with an institution's statistics for the 2014 calendar year. To ease the burden on institutions and to help ensure accuracy, the Department will not collect data on incidents of dating violence, domestic violence, sexual assault, and stalking for the 2013 calendar year, although, as stated above, institutions were expected to include 2013 statistics for these incidents in their 2014 ASRs. In addition, the final regulations require institutions to report the number of crimes determined to be "unfounded" in both the 2015 ASRs and the 2015 Campus Safety and Security Survey. Institutions must still report three years of statistics for all other crime categories. Further, institutions will be required to report the contact information of their lead Title IX coordinator in the 2015 Campus Safety and Security Survey. For more detail on what is included in the ASRs and data collections, please refer to the chart below.

Reporting of New Statistical Requirements in the ASR and Online Data Collection

	Calendar Year 2013	Calendar Year 2014	Calendar Year 2015	Calendar Year 2016
ASR issued by October 1, 2014	X			
ASR issued by October 1, 2015	X	X		
ASR issued by October 1, 2016	X	X	X	
ASR issued by October 1, 2017		X	X	X
Data Collection October 2014				
Data Collection October 2015		X		
Data Collection October 2016		X	X	
Data Collection October 2017		X	X	X

We thank you for your cooperation in the implementation of the new Clery Act regulations necessitated by VAWA. If you have any questions about the information provided in this letter, please direct them to: Ashley.Higgins@ed.gov.

Sincerely,



Lynn B. Mahaffie
 Deputy Assistant Secretary for
 Policy, Planning, and Innovation
 Office of Postsecondary Education