



CAMPUS SECURITY



2024 ANNUAL SECURITY REPORT



OVERVIEW

This report's compilation and distribution are mandated under the Student Right-to-Know and Campus Security Act of 1990.

This law requires colleges and universities to disclose information about campus safety and security procedures and provide statistics concerning the occurrence of several criminal offenses.

INTRODUCTION

Gratz College provides a pluralistic education and engages students in active study for professional growth and personal enrichment. Gratz offers graduate and undergraduate degrees, certificate programs, and learning opportunities for adults and teens. Through productive partnerships, Gratz College seeks to maintain and expand its institutional and academic relationships in Philadelphia, North America, and worldwide. Many of Gratz's programs reflect the College's historical focus on Jewish studies and education. With a broad commitment to diverse constituencies' intellectual and professional growth, Gratz College creates access for students everywhere to become leaders in their professions and communities.

As a recipient of the federal Title IV student financial, Gratz College must adhere to the provisions of the Jeanne Clery Disclosure of Campus Security Policies and Campus Crime Statistics, commonly referred to as the Clery Act. One requirement of the Clery Act is that all postsecondary institutions receiving federal Title IV financial aid must publish an annual report disclosing campus security policies and three years' worth of selected crime statistics. In compliance, this report is prepared by the Gratz College Campus Security Authorities and available to the campus community and others, with the cooperation of local law enforcement agencies and various college offices, including the Office of Academic Affairs and the President's Office.

This publication is distributed under the Pennsylvania College and College Security Information Act and the following federal statutes: Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, Section 486(e) of Public Law: 105-244, and the Accuracy in Campus Crime Reporting Act of 1997.

ANNUAL SECURITY REPORT (ASR)

Annual Security Report with statement of campus security policy and crime statistics provided to current and prospective students and employees under the Clery Act by October 1st of each year.

CLERY ACT

Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act. All public and private institutions of postsecondary education participating in federal student aid program are subject to it.

THE CLERY ACT

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, also known as the Clery Act, is a federal law requiring all colleges and universities to disclose timely and annual information about campus crime and security policies.

Jeanne Clery was 19 years old when she was raped and murdered in her college dormitory. Her parents, Connie and Howard Clery, could not have known the danger she was in; standards for campus crime reporting did not exist in 1986. So, the Clerys put into motion transformative change on two important fronts.

On Capitol Hill, they lobbied for revolutionary policy changes that would eventually take the form of the Jeanne Clery Act. Educators, families, and legislators could have an open dialogue about campus safety for the first time in our country's history.

Connie and Howard also worked with allies and advocates to form a 501(c)(3) nonprofit organization to prevent the violence that had taken Jeanne from them. Today, that organization, the Clery Center, remains dedicated to guiding higher education institutions to implement effective campus safety measures.

(<https://clerycenter.org/about-page/>)

Under the Clery Act, Gratz College provides students and employees with information on its security policies and procedures and specific statistics for certain criminal incidents, arrests, and disciplinary referrals. It makes the information and statistics available at the request of prospective students and employees



THE STUDENT RIGHT-TO-KNOW & CAMPUS SECURITY ACT

The Student Right-to-Know and Campus Security Act requires colleges and universities receiving federal funds to notify community members as to who is considered a "Campus Security Authority". The U.S. Department of Education defines a Campus Security Authority as (1) A campus law enforcement unit; (2) An individual or organization specified in an institution's statement of campus security policy as the individual or organization that has significant responsibility for student and campus activities, but does not have significant counseling responsibilities.

CAMPUS SECURITY AUTHORITIES

The Campus Rights-to-Know Act mandates that institutions disclose statistics for crimes reported to criminal justice agencies and crimes reported to their campus community members. Local contiguous police agencies providing crime data include the Cheltenham Township Police. While everyone on campus is encouraged to report a crime, some individuals are designated campus security authorities (CSA) under the Campus Right-to-Know Act. The named campus security authority is somewhat misleading as it is applied to a group of people who are not necessarily engaged in security-related work by function. According to the law, any person with the authority and duty to act or respond to particular issues on behalf of the College or who has significant responsibility for student actions is defined as a campus security authority (CSA). However, the CSA does not have the power to arrest and carry firearms. The local police are utilized when an arrest is appropriate. The College also uses outside police agencies for additional security during special events. Campus community members are encouraged to report all crimes, emergencies, accidents, and suspicious individuals to a campus security authority.

Gratz College works closely with the Cheltenham Township Police Department, Cheltenham Emergency Management, and Montgomery County Emergency Management, but there is no written memorandum of understanding between them.

Because job titles and official responsibilities vary from campus to campus, the Campus Right to Know Act does not list specific titles that should be designated as a campus security authority. At Gratz College, the following titles have been recognized as campus security authorities:

- President of the College, all subordinate administrators. Dean of College, all subordinate administrators.
- Manager of Business Operations and Facilities, all subordinate administrators.

EXAMPLES OF WHO IS A CSA

- ♦ Professional staff in a dean of students office
- ♦ Faculty or staff advisors to student organizations
- ♦ Contract security officers
- ♦ Event security staff
- ♦ Administrators at branch/satellite/separate campuses
- ♦ A faculty member who does not have any responsibility for student and campus activity beyond the classroom
- ♦ Clerical or cafeteria staff
- ♦ Facilities or maintenance staff



EXAMPLES OF WHO IS A CSA

- Professional staff in a dean of students office.
- Faculty or staff advisors to student organizations.
- Contract security officers.
- Event security staff.
- Administrators at branch/satellite/separate campuses.
- A faculty member who does not have any responsibility for student and campus activity beyond the classroom Clerical or cafeteria staff.
- Facilities or maintenance staff.

ANNUAL SECURITY REPORT

Preparation of the ASR

The Director of Campus Security prepares the Annual Security Report (ASR) of crime statistics in compliance with the Clery Act. Colleges and universities are required to publish the Annual Security Report by October 1.

The ASR includes data gathered from college personnel and local law enforcement agencies. Under the Clery Act, Gratz College must report specific crime data every year, for the most current three-year period, and certain security policy statements, including sexual assault policies, which assure basic victims' rights and explain where students should go to report crimes.


Annually, an email notification is sent to all enrolled students, faculty, and staff providing the latest Annual Security Report location. Copies of the annual report are also available for prospective students and employees on the Gratz College website at prospective students and employees on the

Gratz College website at www.gratz.edu/campus-security.

Gratz College uses the Internet as the ASR distribution, and recipients are notified and provided with the exact Internet address to access the report. Printed copies are available upon request. A copy of the statistics is also provided to the U.S. Department of Education and can be accessed at <https://ope.ed.gov/campussafety/>.

Please note that the Federal Clery Act may define a particular crime differently than that defined under the Pennsylvania State Penal Code. For the purposes of this report, Gratz College uses the Clery Act definitions of crimes. Please see herein for the Clery Act definitions.

Clery Act Requirements – The Basics	
• Collect, classify, and count crime reports and statistics	
• Issue campus alerts and warning notices	• Publish an Annual Security Report (Due date: October 1)
• Disclose missing student notification procedures, when applicable	• Submit crime and fire statistics to the Department, when applicable
• Disclose procedures for institutional disciplinary actions	• Provide educational programs and campaigns
• Keep a daily crime log, when applicable	• Disclose fire safety information, when applicable



KNOW YOUR RIGHTS!

THE STUDENT RIGHT TO KNOW & CAMPUS SECURITY ACT

The Student Right-to-Know and Campus Security Act requires colleges and universities receiving federal funds to notify community members as to who is considered a "Campus Security Authority". The U.S. Department of Education defines a Campus Security Authority as (1) A campus law enforcement unit; (2) An individual or organization specified in an institution's statement of campus security policy as the individual or organization that has significant responsibility for student and campus activities, but does not have significant counseling responsibilities.

POLICY STATEMENT

It is the policy of Gratz College (“Gratz College” or the “College”) to maintain an environment that is free of all forms of discrimination and harassment, including sexual misconduct for its community members. College community members include students, faculty, administrators, staff, volunteers, vendors, contractors, visitors, and individuals regularly or temporarily employed, conducting business, studying, visiting, or having any official capacity with the College or on its property. The College has enacted this Sexual Misconduct Policy (the “Policy”) to reflect and maintain its institutional values and community expectations, to provide for fair and equitable procedures for determining when this Policy has been violated, and to provide recourse for individuals and the community in response to violations of this Policy.

This Policy prohibits all forms of sexual harassment and discrimination, gender-based harassment and discrimination, sexual assault, domestic violence, dating violence, and stalking. This Policy also prohibits retaliation against a person who reports, complains about, or otherwise participates in good faith in any matter related to this Policy. All the foregoing conduct shall be referred to as “Prohibited Conduct.”

Gratz College does not discriminate on the basis of sex in its educational, extracurricular, or other programs or in the context of employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Sexual harassment is also prohibited under Title IX and Title VII of the Civil Rights Act of 1964 and other applicable statutes. This Policy prohibits sexual harassment against Gratz College community members of any sex in the context of education or employment. This Policy also prohibits gender-based harassment that does not involve conduct of a sexual nature. Sexual harassment cases involving two employees will be handled through the Title IX process or Title VII of the Civil Rights Act, depending on the alleged Prohibited Conduct.

Upon receipt of a Formal Complaint, the College will take prompt and equitable action to eliminate the Prohibited Conduct (if any), prevent its recurrence, and remedy its effects. In addition, the College will fulfill its obligations under the Violence Against Women Reauthorization Act of 2013 (“VAWA”) amendments to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) in response to reported Prohibited Conduct. Students, employees, or third parties found to have violated this Policy may face disciplinary action up to and including expulsion (students) or termination of employment or contractual relationship (employees or third-party contractors).

SCOPE OF POLICY

This Policy applies to all reports of Prohibited Conduct occurring on or after the effective date of this Policy. Where the date of the reported conduct precedes the effective date of the revised Policy, the definitions in existence at the time of the report will be used. Where the date of the reported conduct precedes the effective date of the revised Policy, the process in existence will be used until the revised process is adopted. When the revised Policy is adopted, the process under the revised Policy will apply. However, the Grievance Process under this Policy will be used to investigate and resolve all reports made on or after the effective date of this Policy, regardless of when the incident(s) occurred.

When used in this Policy, “Complainant” refers to an individual alleged to be the victim of conduct that could constitute sexual harassment. “Respondent” refers to an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment. A “Third party” refers to any other participant in the process, including a witness or an individual who makes a report on behalf of a Complainant.

The process begins with a Formal Complaint filed by a Complainant or signed by the Title IX Coordinator alleging sexual misconduct against a Respondent and requesting that the College investigate the allegation. The process could begin with an anonymous complaint; however, the ability of the College to process this complaint could be compromised.

At the time of filing a Formal Complaint, a Complainant must be participating in or attempting to participate in the education program or activity of the College.

Nothing in this Policy derogates the legal right of a parent or guardian acting on behalf of the Complainant, Respondent, or Third-Party, including, but not limited to, filing a Formal Complaint.

A possible violation of the Sexual Misconduct Policy is handled through an administrative process. A Complainant may also pursue criminal or civil legal recourse concurrently. One is not dependent upon another.

COVERAGE OF POLICY

Persons Covered by the Policy

This Policy applies to all Gratz College community members, including students, faculty, administrators, staff, volunteers, vendors, contractors, visitors, and individuals regularly or temporarily employed, conducting business, studying, visiting, or having any official capacity with the College or on its property. The Title IX process will resolve situations in which either one or both parties are students or employees.

The College strongly encourages reports of Prohibited Conduct regardless of who engaged in the conduct. Even if the College does not have jurisdiction over the Respondent, the College will take prompt action to provide for the safety and well-being of the Complainant and the broader campus community. The College will provide supportive measures with or without a Formal Complaint.

Locations Covered by the Policy

This Policy applies to the College's educational program or activity, which includes locations, events, or circumstances over which the College exercises substantial control over both the Complainant and Respondent and the context in which the sexual harassment occurs.

This Policy applies to all on-campus conduct. The College strongly encourages reports of Prohibited Conduct even if the Policy does not apply to the conduct because of its location; the College will take prompt action to provide for the safety and well-being of the Complainant and the broader campus community under applicable College policies.

On-Campus Conduct. This Policy applies to conduct that occurs on-campus, including conduct that occurs on property owned or controlled, leased, or managed by the College.

College Programs. This Policy applies to conduct that occurs in the context of college employment or education programs or activities, including, but not limited to, internship programs.

Off-Campus Conduct. This Policy applies to all conduct that occurs on College premises and at College- sponsored activities. The College also has the discretion to discipline a student for conduct that occurs off campus if that conduct adversely affects the College community and/or the pursuit of its objectives. The Dean of the College, in their sole discretion, and on a case-by-case basis, decides whether campus proceedings should be initiated against a student for conduct occurring off campus and refer to the appropriate office.

DEFINITIONS

Prohibited Conduct Definitions

This section defines specifically prohibited types of conduct based on sex or gender, including sex or gender-based harassment and discrimination, and sexual misconduct.

Sexual Harassment means conduct on the basis of sex that satisfies one or more of the following points:

1. An employee of the College conditioning the provision of an aid, benefit, or service of the College on an individual's participation in unwelcome sexual conduct (also known as Quid Pro Quo harassment)
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College's education program or activity. (Also known as Hostile Environment)
3. Sexual Assault (defined below); or Dating Violence (defined below); or Domestic Violence (defined below) or Stalking (defined below).

Anyone may be sexually harassed of any gender or who are gender binary or do not identify with any specific gender. Both subordinates and coworkers may be victims of sexual harassment. While a co-worker does not have the direct ability to hire or fire another co-worker, the person may influence a job evaluation or create an intolerable working environment, which may be handled through the Title IX process or Title VII of the Civil Rights Act.

Sexual harassment may be physical and/ or verbal in nature. Conduct that may be considered sexual harassment includes, but is not limited to, the following examples of Sexual Harassment:

- Unwanted sexual advances or comments
- Inappropriate or unwelcome touching of a person's body
- Implied or overt threats of punitive employment or academic actions as a result of rejection of sexual advances

DEFINITIONS

More subtle incidents may also be considered sexual harassment. Examples of more subtle sexual harassment include, but are not limited to, the following:

- Sending sexually oriented emails and voicemails
- Sexual jokes
- Repeatedly asking for a date when the person has declined
- Display of sexually oriented cartoons, objects, posters
- Indirect sexual innuendo such as voice inflection when complimenting appearance or gazing at parts of the body other than the face

Gender-Based Harassment means harassment based on sex, gender identity, or gender expression, which may include acts of aggression, intimidation, or hostility, whether verbal, physical, graphic, or otherwise. To qualify as Gender-Based Harassment, the conduct need not involve conduct of a sexual nature. Harassing conduct can take many forms. The determination of whether an environment is hostile is based on the totality of the circumstances, including but not limited to:

1. The frequency of the conduct;
2. The nature and severity of the conduct;
3. Whether the conduct was physically threatening;
4. The effect of the conduct on the Complainant's mental or emotional state, with consideration of whether the conduct unreasonably interfered with the Complainant's educational or work performance and/or College programs or activities;
5. Whether the conduct was directed at more than one person;
6. Whether the conduct arose in the context of other discriminatory conduct; and
7. Whether the conduct implicates concerns related to academic freedom or protected speech.

A single isolated incident may create a hostile environment if the incident is sufficiently severe, particularly if the conduct is physical.

DEFINITIONS

Sexual Assault means an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, as defined in 20 U.S.C.

1092(f)(6)(A)(v). Sexual intercourse includes vaginal or anal penetration, however slight, with a body part (e.g., penis, tongue, finger, hand) or object or oral penetration involving mouth-to-genital contact.

Crime Definitions from the National Incident-Based Reporting System (NIBRS) User Manual

(From the Federal Bureau of Investigation Uniform Crime Reporting Program Sex Offenses)

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

A. *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.

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

C. *Statutory Rape* - Sexual intercourse with a person who is under the statutory age of consent. https://www.law.cornell.edu/cfr/text/34/appendix-A_to_subpart_D_of_part_668

Domestic Violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim (ages 11-24) who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. [34 USC 12291(a)(8)]

Dating Violence means violence committed by a person:

1. who is or has been in a social relationship of a romantic or intimate nature with the victim; and
2. where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship.
 - b. The type of relationship.
 - c. The frequency of interaction between the persons involved in the relationship. [34 USC 12291(a)(10)]

DEFINITIONS

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. fear for his or her safety or the safety of others; or
2. suffer substantial emotional distress. [34 USC 12291(a)(30)]

Retaliation

No recipient (the College) or other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX or this part, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this part.

Intimidation, threats, coercion, or discrimination, including charges against an individual for Student Code of Conduct (contained in the Academic Catalog) or Personnel Practices Code violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX or this part, constitutes retaliation.

Charging an individual with a Student Code of Conduct (contained in the Academic Catalog) or Personnel Practices Code violation for making a materially false statement in bad faith during a grievance proceeding under this part does not constitute retaliation prohibited under paragraph (a) of this section, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

The College will take immediate and responsive action to any report of retaliation and will pursue disciplinary action as appropriate. An individual reporting Prohibited Conduct is entitled to protection from any form of retaliation following a report made in good faith, even if the report is later not proven.

DEFINITIONS

Additional Policy Definitions

This section defines other terms used within the Policy that are not previously defined as Prohibited Conduct.

Advisor for the purposes of this Policy means any person of the Respondent or the Complainant's choosing to serve as the Advisor for the Title IX process. This person may be an attorney but does not have to be. The Advisor has specific responsibilities and requirements for participation in the process which are outlined in the section on Rights of the Respondent and Complainant.

Business Day(s) refers to a Business Day or Business Days in which the College is open for business. This is generally Monday through Friday, from 8:30 a.m. until 5:30 p.m. and excludes weekends, holidays, and designated closures including but not limited to weather delays and closures.

Consent for the purposes of this Policy means that agreement to an activity is knowingly and freely given and communicated, through words or actions, to create a mutual understanding regarding the conduction of sexual activity. Elements of consent include:

1. Consent is not valid when it involves:
 - a. Physical force, threats, or intimidation;
 - b. Minors under the age of consent;
 - c. Persons whose mental disabilities prohibit sound judgment;
 - d. Persons physically or mentally incapacitated, either voluntarily or involuntarily, as a result of alcohol or other drug consumption; and
 - e. Individuals who are unconscious, unaware, or otherwise physically incapacitated.
2. Silence cannot be interpreted as consent.
3. Lack of consent may also be communicated through the use of non-verbal expressions or actions indicating resistance.
4. Consent may be withdrawn at any time.
5. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person.
6. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent.

DEFINITIONS

Force means the use or threat of physical violence to overcome an individual's freedom of will to choose whether or not to participate in sexual activity or provide consent. Consent obtained by force is not valid.

For the use of force to be demonstrated, there is no requirement that a Complainant resist the sexual advance or request. However, evidence of resistance by the Complainant will be viewed as a clear demonstration of a lack of consent.

Coercion means the improper use of pressure to compel another individual to initiate or continue sexual activity against that individual's will. Consent cannot be obtained through coercion. Coercion can include a wide range of behaviors, including intimidation, manipulation, threats, and blackmail. A person's words or conduct are sufficient to constitute coercion if they wrongfully impair another individual's freedom of will and ability to choose whether or not to engage in sexual activity. Examples of coercion include, but are not limited to:

- Threatening to out someone based on sexual orientation, gender identity, or gender expression; or
- Threatening to harm oneself if the other party does not engage in the sexual activity; or
- When someone indicates, verbally or physically, that they do not want to engage in a particular sexual activity, that they want to stop a particular activity, or that they do not want to go past a certain point of sexual interaction, continued activity or pressure to continue beyond that point can be coercive.

The College will evaluate the following in determining whether coercion was used:

1. The frequency of the application of pressure;
2. The intensity of the pressure;
3. The degree of isolation of the person being pressured; and
4. The duration of the pressure.

Incapacitation means a physical or mental state in which an individual cannot make an informed and rational decision to engage in sexual activity because of a lack of conscious understanding of the fact, nature, or extent of the act (e.g., to understand who, what, when, where, why, or how of the sexual interaction) and/or is physically helpless.

DEFINITIONS

Examples of incapacitation include, but are not limited to, individuals who:

- Are asleep; or
- Are unconscious; or
- Are unaware that sexual activity is occurring; or
- Cannot understand the nature of the activity or communicate due to a mental or physical condition or
- Are under the influence of alcohol, drugs, or other medication. Consumption of alcohol or other drugs alone is insufficient to establish incapacitation.

The impact of alcohol and drugs varies from person to person, and evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs impacts an individual's:

1. Decision-making ability;
2. Awareness of consequences;
3. Ability to make informed judgments; or
4. Capacity to appreciate the nature and the quality of the act.

It shall not be a valid excuse that the Respondent believed that the Complainant affirmatively consented to the sexual activity if the Respondent knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances: (a) the Complainant was asleep or unconscious; (b) the Complainant was incapacitated due to the influence of drugs, alcohol, or medication so that the Complainant could not understand the fact, nature, or extent of the sexual activity; (c) the Complainant was unable to communicate due to a mental or physical condition.

Whether the Respondent reasonably knew or should have known that the Complainant was incapacitated will be evaluated using an objectively reasonable person standard. The fact that the Respondent was actually unaware of the Complainant's incapacity is irrelevant to this analysis. Consent could not occur when:

- The Respondent failed to appreciate the Complainant's incapacitation; or
- The Respondent failed to take reasonable steps to determine the Complainant's incapacitation or
- The Respondent's own incapacitation (from alcohol or drugs) caused the Respondent to misjudge the Complainant's incapacity.

DEFINITIONS

Each Party is responsible for being aware of the intoxication level of the other party before engaging in sexual activity. Sexual activity while under the influence of alcohol or other drugs poses a risk to all Parties. If there is any doubt about the level or extent of the other individual's intoxication, it is safest to forgo or cease any sexual contact or activity.

Being intoxicated by drugs or alcohol is no defense to any violation of this Policy and does not diminish one's responsibility to obtain consent.

Privacy means that information related to a report of Prohibited Conduct will only be shared with a limited circle of individuals who "need to know" in order to assist in the assessment, investigation, or resolution of the report. While not bound by confidentiality, these individuals will be discreet and respect the privacy of all individuals involved in the process to the extent permitted by law.

The College is committed to protecting the privacy of all individuals involved in the investigation and resolution of reports and Formal Complaints under this Policy. The College is also committed to assisting students, employees, and third Parties in making informed choices. With respect to any report or Formal Complaint under this Policy, the College will make reasonable efforts to protect the privacy of participants, in accordance with applicable state and federal law, while balancing the need to gather information to take steps to eliminate Prohibited Conduct, prevent its recurrence, and remedy its effects.

Confidentiality means that information shared by an individual with designated campus or community professionals will not be revealed to any other individual without the expressed permission of the individual. An individual who seeks confidential assistance may do so by speaking with professionals who have a legally protected confidentiality. (See the section on Resources for how to report confidentially.)

Official with Authority means any official of the College who has authority to institute corrective measures on behalf of the College (§106.30). Gratz College has designated the following positions as Officials with Authority:

- Title IX Coordinator
- Deputy Title IX Coordinator

DEFINITIONS

Responsible Employee means any employee with the obligation to report sexual harassment or the responsibility to inform a student how to report sexual harassment. The College requires that all Responsible Employees share any report of misconduct with the Title IX Coordinator. A Responsible Employee is anyone who:

1. Has the duty to report to appropriate College officials sexual harassment or any other misconduct by students or employees; or
2. A student could reasonably believe has the responsibility to assist them. All College employees who do not have legally protected confidentiality are considered Responsible Employees. The mere ability or obligation to report sexual harassment or to inform a student about how to report sexual harassment, or having been trained to do so, does not qualify an individual as one who has authority to institute corrective measures on behalf of the College;
3. A Responsible employee is any employee with supervisory or leadership responsibilities on campus, including, but not limited to, all faculty (full time, part time, and adjunct), administrators (those with responsibilities for administering a program or service); and staff members.

Complainant means an individual who is alleged to be the victim of conduct that could constitute sexual harassment. (§106.30)

Respondent means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment. (§106.30)

Third-Party refers to any other participant in the process, including a witness or an individual who makes a report on behalf of a Complainant.

Formal Complaint means a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the College investigate the allegation of sexual harassment. (§106.30)

Immunity for Victims

Gratz College encourages the reporting of conduct violations and crimes that occur on campus or against Gratz College students. A victim might be hesitant to report a crime to a College official for fear of being charged with a policy violation themselves (i.e., underage drinking at the time of a sexual assault). It is in the best interest of the College community that a victim of a crime report the incident to a College official. To encourage reporting, Gratz College offers victims of crimes, and may offer those who assist victims of crimes, amnesty from College policy violations related to the incident. Such amnesty is given at the discretion of the Dean of the College or their designee.



If you are a victim of or a witness to an incident that occurred
on campus,
report it to any or all of the following:

Campus Security

215-635-7310 or via email at campussecurity@gratz.edu

Title IX Coordinator, Dr. Ruth Sandberg

215-635-7300 x168 or via email at rsandberg@gratz.edu

Deputy Title IX Coordinator, Thomas Cipriano

215-635-7300 x195 or via email at tcipriano@gratz.edu

General Title IX Contact

email at titleix@gratz.edu

Cheltenham Police Department

215-885-1600 or 911

REPORTING OPTIONS AND RESOURCES

On-Campus Reporting Options

The College strongly encourages all individuals to report any violation of this Policy to the Title IX Coordinator or any College employee who is designated as an Official with Authority. The College recommends that individuals report Prohibited Conduct to any of the following offices or individuals:

1. Officials with Authority (See information above).

Title IX Coordinator and Deputy Coordinators

Gratz College has designated the following individuals to serve in an official capacity regarding Title IX reporting.

Name	Title IX Position	Phone	Email
Dr. Ruth Sandberg	Title IX Coordinator	215-635-7300, ex. 168	rsandberg@gratz.edu
Mr. Tom Cipriano	Deputy Coordinator	215-635-7300, ex. 195	tcipriano@gratz.edu

Title IX Email - titleix@gratz.edu

The Title IX Coordinator, assisted by the Deputy Coordinator, is responsible for the following:

- Ensuring Title IX compliance
- Assessing initial intake reports
- Knowledgeable in College policies and procedures
- Provides information about resources available to both the Complainant and the Respondent
- Assigning appropriate investigators to individual cases
- Identifying the appropriate College policy to resolve the complaint in a prompt and equitable manner
- Tracking and monitoring incidents of sex discrimination and sexual misconduct
- Providing information on options for complaint resolution
- Coordinating education and prevention efforts

REPORTING OPTIONS AND RESOURCES

Law Enforcement Reporting Options On and Off Campus

Complainants have the right to notify or decline to notify law enforcement. The College strongly encourages all individuals to seek assistance from law enforcement immediately after an incident of Sexual Misconduct. This is the best option to ensure evidence preservation and begin a timely investigative and remedial response. The College will assist any Gratz College community member in securing a safe place to go; assist in arranging transportation to the hospital should the Complainant need medical care or assistance; and assist in coordination with law enforcement and information about on-campus and off-campus resources and options for resolution.

Supportive Measures

Supportive Measures are non-disciplinary services offered as appropriate, as reasonably available, and without fee or charge to both the Complainant and the Respondent before or after filing a Formal Complaint or where no Formal Complaint has been filed. These Supportive Measures are designed to restore or preserve equal access to the College's education program or activity without unreasonably burdening the Complainant and Respondent, including measures designed to protect the safety of all Parties or the College's educational environment or deter sexual harassment. The College offers support to Complainants and Respondents through access to the following services:

Supportive Measures for Students

- Provide academic support services, such as tutoring, extensions of deadlines or other course-related adjustments, and class schedules;
- Change in work schedule or job assignment;
- Mutual restrictions on contact between the parties;
- Provide information regarding off-campus services;
- Provide other Supportive Measures as appropriate.

Supportive Measures for Employees

- Modification of work schedule;
- Mutual restrictions on contact between the parties;
- Changes in work or locations;
- Leaves of absence;
- Increased security and monitoring of certain areas of campus;
- Provide other Supportive Measures as appropriate.

REPORTING OPTIONS AND RESOURCES

A Complainant or a Respondent may request a “No-Contact Order” or other protection, or the College may choose to use Supportive Measures at its discretion to ensure the safety of all Parties, the broader College community, and/or the integrity of the process.

The College will maintain the privacy of any Supportive Measures provided under this Policy to the extent practicable. It will promptly address any violation of the Supportive Measures put in place. All individuals are encouraged to report concerns about the failure of another individual to abide by any restrictions imposed by Supportive Measures. The College will take immediate and responsive action to enforce a previously implemented restriction if such restriction is violated.

Emergency Removal

Nothing in this Policy precludes the College from removing a Respondent from the College’s education program or activity on an emergency basis, provided that the College undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the Respondent with notice and an opportunity to challenge the decision immediately following the removal. This provision may not be construed to modify any rights under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, or the Americans with Disabilities Act of 1990.

In the event that an Emergency Removal is enacted, the Respondent has the opportunity to submit in writing a challenge to the emergency removal. The challenge to the emergency removal must contain all information, documentation, and evidence that the Respondent wants to have considered in requesting to remain on campus. The Title IX Coordinator will receive the written materials and appoint an Appeals Officer. The Appeals Officer is separate from investigators, hearing panel members, and decision-makers. The Appeals Officer will review all materials and determine if the Emergency Removal is in the best interest of the Complainant and/or the Respondent and/or is in the best interest of the safety of the campus community. The Appeal Officer’s decision is final and binding regarding the Emergency Removal.

Administrative Leave

Nothing in this Policy precludes the College from placing a non-student employee Respondent on administrative leave during the pendency of this process. This provision may not be construed to modify any rights under Section 504 of the Rehabilitation Act of 1973 or the Americans with Disabilities Act of 1990.

Educational Programming and Prevention

The College offers a variety of educational programs on Sexual Misconduct aimed at prevention and awareness of sexual assault, stalking, dating violence, and sexual harassment.

REPORTING OPTIONS AND RESOURCES

Support Networks and Contacts

If you or someone you know is a victim of sexual violence, you are not alone. Resources are available to assist you in your assistance and your rights as a victim.

- **Cheltenham Police Department:** 215-885-1600 or 911
- **Philadelphia Police Department Special Victims Unit:** 215-685-3251 or 911
- **Philadelphia Domestic Violence Hotline:** 1-866-723-3014
- **Women Organized Against Rape (WOAR):** 215-985-3333

Sexual Offender Registry

To ensure that the information (about registered sex offenders) is readily accessible to the campus community, the Campus Sex Crimes Prevention Act requires colleges to provide the campus community with clear instructions as to where this information can be found.

In compliance with the Campus Sex Crimes Prevention Act, local law enforcement agencies and state websites where registered sex offender information may be obtained are listed below. All sex offenders must register under state law where they live and with the state of any higher education institutions where the offender is a student, is employed, or carries on a vocation.

- **Pennsylvania Megan's Law Website:** www.pameganslaw.state.pa.us
- **Cheltenham Police Department:** 215-885-1600 or 911
- **Philadelphia Police Department Special Victims Unit:** 215-685-3251 or 911

GRIEVANCE PROCEDURES

Grievance Procedures for Resolving Allegations of Sexual Misconduct

General Information

The following outlines the procedures the College follows in resolving allegations by a Complainant against a Respondent in violation of the College's Sexual Misconduct Policy. Complainant and Respondent will be referred to collectively as the "Parties." This is an administrative process.

Situations in which both Complainant and Respondent are employees of the College are to be handled through the processes outlined in the Nondiscrimination Policy or through the Title IX process depending upon the alleged Prohibited Conduct.

The Office of Title IX, and the Title IX team, will coordinate the resolution of all reports of Prohibited Conduct defined in the Gratz College Sexual Misconduct Policy.

Prohibited Conduct Not Based on Sex

Prohibited Conduct (discrimination, harassment, or retaliation) based on protected status other than sex (e.g., race, color, age, disability, veteran status, or other classification protected by federal or state law or College policies) is prohibited by other College policies. These policies prohibiting other forms of discrimination and harassment are described in the Gratz College Nondiscrimination Policy. In the event of such complaints, the College will identify, based on the allegations, the appropriate office to coordinate the resolution of the report.

Dismissal of Formal Complaint

If the conduct alleged in the Formal Complaint would not constitute sexual harassment as defined in this Policy even if proved or did not occur in the College's education program or activity or did not occur against a person in the United States, then the College must dismiss the Formal Complaint with regard to that conduct for purposes of sexual harassment under this Policy. However, such a dismissal does not preclude action under another provision of the Student Code of Conduct (contained in the Academic Catalog) or Personnel Practices Code.

GRIEVANCE PROCEDURES

The College may dismiss the Formal Complaint or any allegations therein, if at any time during the investigation or hearing:

1. A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein;
2. The Respondent is no longer enrolled or employed by the College; or
3. Specific circumstances prevent the College from gathering sufficient evidence to determine the Formal Complaint or allegations therein.

Upon dismissal of the Formal Complaint, either required or permitted, the College will promptly send written notice of the dismissal and reasons for the dismissal simultaneously to each Party through email, the College's official means of communication. The Complainant or the Respondent has the right to appeal the decision to dismiss a Formal Complaint.

Consolidation of Formal Complaints

The College may consolidate Formal Complaints as to allegations of sexual harassment against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one Party against another Party, where the allegations of sexual harassment arise out of the same facts or circumstances.

Rights of Respondent and Complainant

- Right to be informed of the process and all available options
- Right to be informed of resources
- Right to Supportive Measures
- Right to a timely investigation
- Right to an Advisor of choice
- Right to review report
- Right to appeal

GRIEVANCE PROCEDURES

Advisor

Both Complainant and Respondent have the right to have an Advisor of their choice. It is the responsibility of the Complainant and Respondent to communicate with the Advisor regarding allegations, times and dates of meetings, hearings, outcomes and any other information regarding the case. The Investigators, Title IX Coordinator, and Deputy Coordinator will not discuss the case with any Advisor. The Advisor may:

- Attend any meeting or hearing with the respective Complainant or Respondent regarding the case, if invited by the respective Complainant or Respondent
- May not participate directly in any meeting involving the case
- May provide advice to the Complainant or the Respondent he/she is advising through quiet conversation or written notes in any meeting related to the case
- May be a member of the College community but is not required to be
- May be an attorney but is not required to be
- If a party does not have an Advisor present at the Live Hearing, the College must provide without fee or charge to that party, an Advisor of the College's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party. [§106.45 (b)(6) (i)]
- At the Live Hearing, the decision-maker(s) must permit each party's Advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. [§106.45 (b)(6) (i)]

Step-by-Step Process

Actual Knowledge

The Title IX grievance process begins with Actual Knowledge. Actual knowledge means notice of sexual harassment or allegations of sexual harassment to the College's Title IX Coordinator or any Official with Authority who has authority to institute corrective measures on behalf of the College. [§106.30]. The actual knowledge standard is not met when the only official of the College with actual knowledge is the Respondent. Actual Knowledge may come in the form of a Formal Complaint.

GRIEVANCE PROCEDURES

Intake meeting with Complainant

With or without a Formal Complaint, the Title IX Coordinator must promptly contact the Complainant to discuss the availability of Supportive Measures, consider the Complainant's wishes with respect to supportive measures, and explain to the Complainant the process for filing a Formal Complaint.

- Address immediate physical safety and emotional well-being needs
- Notify the Complainant of the right to contact law enforcement and seek medical treatment (and the right to decline to do so), and the importance of the preservation of evidence
- Notify the Complainant of the right to be assisted by individuals at the College in contacting law enforcement
- Notify the Complainant of confidential and non-confidential reporting options on and off campus
- Provide the Complainant with information about:
 - On and off campus resources, including counseling, health, mental health, and victim advocacy;
 - The range of Supportive Measures and remedies, including changes to academic, transportation, and/or working situations, or other protective measures, which are available to the Complainant and the Respondent regardless of whether the Complainant files a Formal Complaint with the College or other action with local law enforcement.
- Provide an overview of the procedural options and process, including Informal Resolution and Formal Resolution. This overview would include an explanation that the Complainant will receive written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the Complainant to prepare to participate.
- Explain that if, in the course of an investigation, the College decides to investigate allegations about the Complainant or the Respondent that are not included in the notice described above, the College will provide notice of the additional allegations to the Parties.
- Provide notice of any provision in the Student Code of Conduct (contained in the Academic Catalog) and Personnel Practices Code that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.
- Explain the right to object to the assignment of the Title IX Coordinator, Deputy Title IX Coordinator, or Investigators based on bias or conflict of interest within 1 (one) Business Day of a decision to proceed through the process;
- Explain that the student has a right to an Advisor of their choice during the process;

GRIEVANCE PROCEDURES

- Assess for pattern of evidence or other similar conduct if possible;
- Explain the College's immunity/amnesty policy as published above in this document;
- Explain the College's policy prohibiting retaliation as published in this document;
- Respondent is presumed not responsible for the alleged conduct and any determination regarding responsibility is made at the conclusion of the process;
- If the Title IX Coordinator dismisses the Formal Complaint or any allegations therein, both Complainant and Respondent have the right to appeal that decision.

At the Intake Meeting, the Coordinator or Deputy Coordinator will provide the Complainant with the above- listed information in writing. If the Intake Meeting is conducted by a Deputy Coordinator, the meeting report will be submitted to the Coordinator for consideration. As described in the Sexual Misconduct Policy, the Complainant has the right to request that the Title IX Office not share the Complainant's name (or other identifiable information) with the Respondent or that the Title IX Office take no formal action in response to the report. If the Complainant makes such a request, the Coordinator will balance the request with his/her dual obligation to provide a safe and nondiscriminatory environment for all College community members and to remain true to principles of fundamental fairness that require the College to provide the Respondent with notice of the allegations and an opportunity to respond before action is taken against the Respondent.

The Coordinator will make this determination consistent with the following considerations, namely:

1. The seriousness of the conduct;
2. The respective ages and roles of the Complainant and the Respondent;
3. Whether there have been other complaints or reports of Prohibited Conduct against the Respondent and
4. The right of the Respondent to receive notice and relevant information before disciplinary action is sought.

Should the Coordinator determine that, in response to the Complainant's request, the College can satisfy its obligations to the Complainant, the College community members, and the Respondent without proceeding through the process described herein, the Coordinator has the discretion to do so.

GRIEVANCE PROCEDURES

Absent a request for confidentiality as described above, the Coordinator or Deputy Coordinator will interview the Complainant to gain a basic understanding of the reported Prohibited Conduct. The interview will focus on key facts upon which the Complainant bases the report (i.e., who, what, where, and when) to assess how to proceed. At the conclusion of the Intake Meeting, and if the individual wishes to move forward with a complaint, the Coordinator will make two threshold determinations:

1. Does the Complainant's report state facts that, if true, could constitute a violation of the College's Sexual Misconduct Policy?
2. If yes, should the College proceed through Informal Resolution?

The Coordinator will make both threshold determinations after the Intake Meeting with the Complainant as soon as possible and communicate that finding in writing to the Complainant.

Initial interview with Respondent

The College will provide written notice to the Respondent of the allegations of sexual harassment, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview.

The Title IX Coordinator or Deputy Coordinator or assigned internal or external Investigator will schedule an initial interview with the Respondent to discuss the availability of Supportive Measures, consider the Respondent's wishes with respect to supportive measures, and explain to the Respondent the process for resolving a Formal Complaint:

- Address immediate physical safety and emotional well-being needs;
- Notify the Respondent of the right to contact law enforcement and seek medical treatment (and the right to decline to do so), and the importance of preservation of evidence;
- Notify the Respondent of the right to be assisted by individuals at the College in contacting law enforcement;
- Notify the Respondent of confidential and non-confidential reporting options on and off campus;
- Provide the Respondent with information about:
 - On and off-campus resources, including counseling, health, mental health, and victim advocacy;
 - The range of Supportive Measures and remedies, including changes to academic, transportation, and/or working situations, or other protective measures, which are available to the Complainant and the Respondent regardless of whether the Complainant files a Formal Complaint with the College or other action with local law enforcement.

GRIEVANCE PROCEDURES

- Provide an overview of the procedural options and process, including Informal Resolution and Formal Resolution. This overview would include an explanation that the Complainant will receive written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the Respondent to prepare to participate;
- Explain that if, in the course of an investigation, the College decides to investigate allegations about the Complainant or the Respondent that are not included in the notice described above, the College will provide notice of the additional allegations to the Parties;
- Provide notice of any provision in the Student's Code of Conduct (contained in the Academic Catalog) and Personnel Practices Code that prohibits knowingly making false statements or knowingly submitting false information during the grievance process;
- Explain the right to object to the assignment of the Title IX Coordinator, Deputy Title IX Coordinator or Investigators based on bias or conflict of interest within 1 (one) Business Day of a decision to proceed through the process;
- Explain that the student has a right to an Advisor of their choice during the process;
- Assess for a pattern of evidence or other similar conduct if possible;
- Explain the College's immunity/amnesty policy as published above in this Policy;
- Explain the College's policy prohibiting retaliation as published in this Policy;
- Respondent is presumed not responsible for the alleged conduct, and any determination regarding responsibility is made at the conclusion of the process;
- If the Title IX Coordinator dismisses the Formal Complaint or any allegations therein, both Complainant and Respondent have the right to appeal that decision.
- Address immediate physical safety and emotional well-being needs;
- Notify the Respondent of the right to contact law enforcement and seek medical treatment (and the right to decline to do so) and the importance of preservation of evidence;
- Notify the Respondent of the right to be assisted by individuals at the College in contacting law enforcement;
- Notify the Respondent of confidential and non-confidential reporting options on and off campus;

GRIEVANCE PROCEDURES

- Provide the Respondent with information about:
 - On and off campus resources, including counseling, health, mental health, and victim advocacy;
 - The range of Supportive Measures and remedies, including changes to academic, transportation, and/or working situations, or other protective measures, which are available to the Complainant and the Respondent regardless of whether the Complainant files a Formal Complaint with the College or other action with local law enforcement.
- Provide an overview of the procedural options and process, including Informal Resolution and Formal Resolution. This overview would include an explanation that the Complainant will receive written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the Respondent to prepare to participate;
- Explain that if, in the course of an investigation, the College decides to investigate allegations about the Complainant or the Respondent that are not included in the notice described above, the College will provide notice of the additional allegations to the Parties;
- Provide notice of any provision in the Student's Code of Conduct (contained in the Academic Catalog) and Personnel Practices Code that prohibits knowingly making false statements or knowingly submitting false information during the grievance process;
- Explain the right to object to the assignment of the Title IX Coordinator, Deputy Title IX Coordinator or Investigators based on bias or conflict of interest within 1 (one) Business Day of a decision to proceed through the process;
- Explain that the student has a right to an Advisor of their choice during the process;
- Assess for pattern of evidence or other similar conduct if possible;
- Explain the College's immunity/amnesty policy as published above in this Policy;
- Explain the College's policy prohibiting retaliation as published in this Policy;
- Respondent is presumed not responsible for the alleged conduct, and any determination regarding responsibility is made at the conclusion of the process;
- If the Title IX Coordinator dismisses the Formal Complaint or any allegations therein, both Complainant and Respondent have the right to appeal that decision.

GRIEVANCE PROCEDURES

Determining Course of Resolution for the Grievance

As an alternative to Formal Resolution, and only if the Coordinator determines that it is appropriate, the Parties may choose to resolve complaints through Informal Resolution. Informal Resolution must be mutually agreed upon in writing by both parties in any case.

Some complaints that allege harassment may be appropriate for Informal Resolution. The purpose of an Informal Resolution is to stop the inappropriate behavior. The process will not be used to resolve allegations that an employee sexually harassed a student. Sec. 106.45(b)(9). Suppose the Coordinator determines that the Formal Complaint may be resolved appropriately through informal resolution. In that case, the Coordinator will ask the Complainant and the Respondent separately whether they agree to pursue the complaint's resolution informally. In writing, the parties must voluntarily agree to consent to use the Informal Resolution process. Any resolution reached through an informal process will be confirmed in writing and provided to the parties.

Informal Resolution

An Informal Resolution process cannot begin unless a Formal Complaint is filed. An individual who feels she/he is being harassed may seek to resolve the matter informally. Examples of informal ways to resolve a complaint of sexual harassment may include:

- A supervisor counsels the accused individual to stop the alleged misconduct or
- Confronting the harasser face to face; or
- Writing a letter to the harasser; or
- Requesting advice and/or intervention from a Title IX Coordinator or third party.

The main purpose of the Informal Resolution procedure is to stop inappropriate behavior. To proceed with Informal Resolution, the College must provide the parties with written notice:

1. Disclosing the allegations, and
2. The requirements of the Informal Resolution process, including the circumstances under which the parties could be precluded from resuming a Formal Resolution process arising from the same allegations and
3. That no party can be required, as a condition of enrollment or continuing enrollment, employment or continuing employment, or enjoyment of any other right, to waive their right to an investigation and adjudication of a Formal Complaint.

Any Party (including the Title IX Coordinator) may terminate the Informal Resolution process at any time up until the Informal Resolution becomes binding. In that event, the Title IX Coordinator will so notify the Parties in writing via official College email and will describe the next steps and timeframes for the Formal Resolution. If the Parties reach an agreement, the matter is closed. If not, the Parties will proceed with the Formal Resolution set forth in the section on Formal Resolution below.

GRIEVANCE PROCEDURES

At the conclusion of an Informal Resolution, and upon receipt of official notification via College email, the Complainant and the Respondent have 2 (two) Business Days to change their mind about the resolution of the case. If either the Complainant or the Respondent changes their mind regarding the agreed-upon resolution, they must do so in writing and submit it to the Title IX Coordinator. Should the Party's request not be received in writing (including electronically) or does not submit within 2 (two) Business Days, the informal resolution will be considered final and binding.

Formal Resolution

A Formal Resolution process cannot begin unless a Formal Complaint is filed. If the Coordinator determines that the Complainant's report must proceed through Formal Resolution, the Coordinator will notify both Parties, in writing, of the decision. The Coordinator's written notification to the Respondent will state facts sufficient to apprise the Respondent of the nature of the allegations, including, specifically:

1. Complainant's name
2. Nature of the Report
3. Specific policy violations (example: sexual assault, sexual harassment, retaliation)
4. Date of alleged policy violations
5. Time of alleged policy violations
6. Location of alleged policy violations
7. Brief description of allegations

Investigation

All investigations will be conducted in a timely and impartial manner. The Parties will be informed of the projected timeline for the conclusion of the process. There may be temporary delays in the process and limited extensions of time frames for good cause. The Parties will be provided written notice of the delay and reasons for such delay.

The Coordinator and/or Deputy will conduct the preliminary investigation or select trained internal or external investigators to conduct a reasonable, impartial, and prompt investigation of the complaint. The Coordinator will select Investigators based on several factors, including:

- The Parties involved,
- The complexity of the complaint,
- The need to avoid potential conflict of interest and who may best conduct a fair and equitable investigation for all parties involved.

The Coordinator will notify the Parties, in writing, of the designated Investigators' names at the time the Coordinator issues the notice of a Formal Resolution process. Both Parties will have 2 (two) Business Days to object to the Investigators selected on the basis of bias or conflict of interest. If either of the Parties objects, the Coordinator will evaluate whether the objection is substantiated. The Coordinator will remove and replace any Investigator the Coordinator finds to have a bias or conflict of interest against either Party. The Coordinator's decision is final and cannot be appealed.

GRIEVANCE PROCEDURES

The Investigators will commence the investigation once the time for the Parties to object to the selected investigators has expired or, if an objection is made, and the Coordinator determines the objection is not substantiated, from the time the Coordinator notifies the objecting party of the determination). In consultation with the Coordinator, the investigators will establish a preliminary timeline and process for conducting the investigation and report the timeline to the Parties. The Parties will also be notified of any delays and the new timeline in writing.

Step One: Fact-Gathering

The Investigators will interview both Parties and relevant witnesses, including fact and expert witnesses, and gather documentary evidence provided by the Parties and any identified witnesses. This evidence will include both inculpatory and exculpatory evidence. The burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the College and not on the Parties.

The Investigators will prepare a summary of each interview (“Interview Summary”). The Investigators will share the Interview Summary with the interviewee. The interviewee will have the opportunity to correct or comment on any statements made in the Interview Summary.

Suppose the interviewee has no corrections to or comments on the Interview Summary. In that case, the interviewee will sign an acknowledgment that the interviewee has reviewed and agrees that the Interview Summary is accurate. Suppose the interviewee has corrections or comments to the Interview Summary. In that case, the interviewee may submit a written response directly to the Investigators within 3 (three) Business Days reflecting any additions or changes that the interviewee believes are necessary to ensure the accuracy of the interviewee’s statement. If no response is received from the interviewee, their Interview Summary may be included in the Investigative Title IX report and will be presumed to be accurate. In all instances where the Investigators include the Interview Summary as an exhibit to a report, the Investigators will also include any response.

The Investigators may use, if available, all of the following but are not limited to the following:

- Police Reports
- Video or Audio recordings
- Witness statements
- Campus Reports (scan logs, campus business, required programs completed)
- All other appropriate reports, recordings, etc.

The College cannot access, consider, disclose, or otherwise use a Party’s records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional’s or paraprofessional’s capacity or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the Party, unless the College obtains that Party’s voluntary, written consent.

GRIEVANCE PROCEDURES

Step Two: Rebuttal Fact-Gathering

The Investigator may conduct follow-up interviews with both Parties and witnesses based upon testimonial and documentary evidence gathered during Initial Fact Gathering. The Parties and witnesses can expect that, in these follow-up interviews, the Investigator will seek responses to specific allegations or evidence. To the extent additional material, witnesses, or evidence are identified during Rebuttal Fact- Gathering, the Investigator will conduct additional interviews and gather additional evidence. Rebuttal Fact Gathering may be repeated as necessary to ensure a complete gathering of evidence.

Step Three: Preliminary Report

1. The Investigators will prepare a Preliminary Report. The Preliminary Report is a written summary of the evidence gathered in the course of the Preliminary Investigation.
2. The Investigators will state specific factual findings in the Preliminary Report (e.g., “Complainant was incapacitated” or “Respondent believed that Complainant was not incapacitated”).
3. The standard for determining each factual finding is the Preponderance of Evidence standard. This standard of proof is that the evidence presented during the investigation must be considered to be more likely than not to be factual.
4. The Investigators will not state ultimate findings as to whether the Respondent has, or has not, violated one or more of the College’s policies.
5. The Investigators will attach as exhibits to the Preliminary Report all Interview Summaries and any documentary evidence gathered as part of the investigation that is directly related to the allegations in the Formal Complaint, including any evidence upon which the College does not intend to rely in reaching a determination regarding responsibility and any inculpatory or exculpatory evidence whether obtained from a Party or other source.
6. When the Investigators determine that the Preliminary Investigation is complete, the Investigators will submit the Preliminary Report to the Coordinator. The Coordinator may require the Investigators to conduct additional investigations. If so, the Investigators will conduct additional investigation consistent with the procedures outlined above.

Step Four: Notice of Preliminary Investigation Findings and Opportunity to Respond

1. Once the Coordinator has agreed that the Preliminary Investigation is complete, the Coordinator will provide the Preliminary Report to the Parties and Advisor, if any, for review. Neither the Complainant nor the Respondent (or their Advisors, including but not limited to family members and/or legal counsel) may copy, remove, photograph, print, image, videotape, record, or in any manner otherwise duplicate or remove the information provided.

GRIEVANCE PROCEDURES

- a. The Parties may respond to the Preliminary Report; the Parties will have ten (10) Business Days to submit any response of being notified of their opportunity to review the report. The Parties may respond in one or both of the following ways:
 - i. The Parties may provide a written response to the Preliminary Report, or any portion of it, including each Interview Summary. The Investigators will consider any written response provided by the Parties in preparing the Investigative Report.
 - ii. The Parties may submit a written request for additional investigation. Such requests may include, but are not limited to, the following:
 1. Request for follow-up interviews
 2. Requests for interviews with new witnesses
 3. Requests to consider new information
2. If neither of the Parties requests additional investigation, the Investigators will prepare the Final Investigative Report. If either (or both) Parties request additional investigation, the Investigators will review the request(s) in consultation with the Coordinator.
3. The Investigators will conduct the requested additional investigation if the Investigators, in consultation with the Coordinator, determine that the request(s) will assist the Investigators in completing the investigation.
4. The Investigators and Coordinator will assess whether investigation of the additional information requires a substantial deviation from the recommended timeframe for completion of the investigation. If so, the Coordinator will notify the Parties in writing with an anticipated revised timeframe.
5. If the Investigators conduct additional investigation, the Investigator will prepare an Addendum to the Preliminary Report (“Addendum”).
6. The Investigators will submit the Addendum to the Coordinator. The Coordinator may require the Investigators to conduct additional investigation before the Addendum is complete.

GRIEVANCE PROCEDURES

Step Five: Final Investigative Report

1. The Investigators will prepare a Final Investigative Report. The Final Investigative Report consists of the testimonial and documentary evidence from the Preliminary Investigation, the Preliminary Report, the Addendum (if applicable), and all the Parties' responses throughout the Formal Resolution proceeding.
2. When the Investigators are satisfied that the Final Investigative Report is complete, the Investigators will submit the Final Investigative Report, including findings, to the Coordinator. The decision-maker in the case is under an independent obligation to evaluate objectively all relevant evidence and not defer to any recommendations in the Final Investigative Report.
3. The Coordinator will review the Final Investigative Report.
4. The Coordinator will provide to each Party and the Party's Advisor, if any, a copy of the Final Investigative Report in an electronic or hard copy. Neither the Complainant nor the Respondent (or their Advisors, including but not limited to family members and/or legal counsel) may copy, remove, photograph, print, image, videotape, record, or otherwise duplicate or remove the information provided.
5. No sooner than 10 (ten) Business Days after sending the Final Investigative Report, the Coordinator will meet individually with the Complainant and the Respondent. If both Parties wish to resolve the case without an adjudication, the Coordinator can facilitate an Informal Resolution of the Formal Complaint that does not necessitate a full adjudication. The Parties must agree to this Informal Resolution in writing. [106.45(b)(9)] At the conclusion of an Informal Resolution, and upon receipt of official notification via College email, the Complainant and the Respondent have 2 (two) Business Days to change their mind about the resolution of the case. If either the Complainant or the Respondent changes their mind regarding the agreed upon resolution, they must do so in writing and submit it to the Title IX Coordinator. Should the Party's request not be received in writing (including electronically), or does not submit within 2 (two) Business Days, the informal resolution will be considered final and binding.
6. If either of the Parties do not wish to participate in the Informal Resolution prior to an adjudication by the hearing panel, the Coordinator will schedule a hearing on the case not less than 10 (ten) Business Days from the meeting to schedule the Live Hearing.

Step Six: Live Hearing

1. Live Hearings are administrative hearings.
2. Decision-makers could be either internal or external to the College.
3. Live Hearings will be conducted with all parties physically present in the same geographic location or, at the College's discretion, any or all parties, witnesses, and other participants may appear at the Live Hearing virtually, with technology enabling participants simultaneously to see and hear each other.
4. The College must create an audio or audiovisual recording, or transcript, of any Live Hearing and make it available to the parties for inspection and review.
5. The Standard of Evidence is Preponderance of Evidence throughout the Title IX Process including Live Hearings.

GRIEVANCE PROCEDURES

6. Cross-examination is allowed with specific rules.
 - a. At the Live Hearing, the decision-maker(s) must permit each party's Advisor to ask the other Party and any witnesses all relevant questions and follow-up questions, including those challenging credibility.
 - b. Such cross-examination at the Live Hearing must be conducted directly, orally, and in real-time by the Party's Advisor of choice and never by a Party personally, notwithstanding the discretion of the College under Sec. 106.45 (b)(5)(iv) to otherwise restrict the extent to which Advisors may participate in the proceedings. Other than cross-examination, Advisers may not participate in the hearing and may only communicate with the Party whom they advise in the case through whispers or written word.
 - c. If a Party does not have an Advisor present at the Live Hearing, the College must provide without fee or charge to that Party, an Advisor of the College's s choice, who may be but is not required to be, an attorney, to conduct cross-examination on behalf of that Party. [§106.45 (b)(6) (i)]
 - d. Only relevant cross-examination and other questions may be asked of a Party or witness as determined by the hearing panel chair.
 - e. Before a Complainant, a Respondent, or a witness answers a cross-examination or other question, the decision-maker(s) must determine whether the question is relevant and explain any decision to exclude a question as irrelevant.
 - f. Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.
 - g. If the Respondent or Complainant refuses to answer the questions of the opposing Party's Advisor, the Hearing Panel can utilize the testimony of the Party and decide the weight of the evidence and testimony.
7. Each Party will receive written notification of the outcome of the Live Hearing. The notification will include the following elements:
 - a. Determination of responsibility, including identifying the allegations of sexual harassment.
 - b. Procedural steps taken from the receipt of the Formal Complaint through the determination, including notifications to the Parties, interviews with the Parties, witnesses, site visits, and methods used to gather information.
 - c. Findings of fact supporting the determination.
 - d. Conclusions regarding the application of the Student Code of Conduct (contained in the Academic Catalog) or Personnel Practices Code to the facts.
 - e. A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the College imposes on the Respondent, and whether remedies designed to restore or preserve equal access to the College's education program or activity will be provided by the College to the Complainant.
 - f. Description of permissible procedures for appeal.

GRIEVANCE PROCEDURES

Order and Rules for Live Hearing

1. Introduction
 - a. Introduction of all Parties, including Complainant, Respondent, Witnesses, Advisors, Investigators, Hearing Panel, and any Title IX staff.
 - b. Review of Procedures and reminders about appropriate decorum of those present.
2. Presentation of the Final Investigative Report
 - a. Investigator presents the Final Investigative Report.
 - b. Questions by Hearing Panel of the Investigator.
 - c. Questions by Complainant of the Investigator.
 - d. Questions by the Respondent of the Investigator.
3. Presentation of Complainant's Case
 - a. Opening Statement by Complainant.
 - b. Questions by the Hearing Panel of Complainant.
 - c. Cross-examination of Complainant by Respondent's Advisor. All cross-examination questions must be approved by the Hearing Panel chair prior to answering.
 - d. Statement of Complainant's Witnesses.
 - e. Questions by the Hearing Panel of Complainant's Witnesses.
 - f. Cross-examination of witnesses by Respondent's Advisor. All cross-examination questions must be approved by the Hearing Panel Chair prior to answering.
4. Presentation of Respondent's Case
 - a. Opening Statement by Respondent.
 - b. Questions by Hearing Panel of Respondent.
 - c. Cross-examination of Respondent by Complainant's Advisor. All cross-examination questions must be approved by the Hearing Panel chair prior to answering.
 - d. Statement of Respondent's Witnesses.
 - e. Questions by the Hearing Panel of Respondent's Witnesses.
 - f. Cross-examination of witnesses by Complainant's Advisor. All cross-examination questions must be approved by the Hearing Panel Chair prior to answering.
5. Closing
 - a. Each Party makes closing statements. (Complainant and then Respondent)
 - b. Final questions, if any, by the Hearing Panel.
 - c. Final remarks by Hearing Panel concerning process.
6. All parties except for the Hearing Panel are dismissed.
7. The Hearing panel deliberates in private.
8. If the Hearing Panel determines that the Respondent is responsible, the Hearing Panel will be given information on the Respondent's prior sanctions to be used in determining the appropriate sanctions.
9. The Hearing Panel informs the Title IX Coordinator of the determination within 3 (three) Business Days. It provides a rationale as described above for elements required in the notification to the Parties.

Either Party may appeal the decision within 5 (five) business Days of the decision. The section below outlines the Appeals Process.

GRIEVANCE PROCEDURES

Step Seven: Appeals

Either the Complainant or the Respondent may appeal the decision of the Hearing Panel within 5 (five) Business Days of the receipt of the decision. Appeals must be in writing and based on one of the following grounds for appeal, which must be specifically stated in the written appeal.

Grounds for Appeal:

1. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
2. Procedural irregularity that affected the outcome of the matter; or
3. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against the Complainants or the Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

An appeal is not to rehear the case but to review whether any of the above, if present, influenced the outcome of the case.

An Appeals Officer will hear appeals for cases arising under this Policy. The Coordinator will receive the written materials and appoint an Appeals Officer.

The Appeals Officer will have access to all documents including, but not limited to:

- Recordings, both audio and video
- Communications, including electronic and non-electronic written documents
- Reports
- Responses to reports
- Addenda
- Other documents associated with the case that are not made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity or assisting in that capacity and which are made and maintained in connection with the provision of treatment to the Party, unless the College obtains that Party's voluntary, written consent

GRIEVANCE PROCEDURES

If the Appeals Officer determines that a ground for appeal is substantiated, the case will be returned to the Coordinator. Otherwise, the decision of the hearing panel stands. The decision of the Appeals Officer is final and binding.

When a case is returned to the Coordinator, the Coordinator may:

1. Decide to drop the case (e.g., based on insufficient information to believe that a policy violation may have occurred) or
2. Send the case to the original hearing panel for reconsideration, or
3. Send the case to a new hearing panel with the same or different charges and/or (re)implement any aspect of the disciplinary process. When a case is sent back for a new hearing, it is possible that a different decision (i.e., the decision of responsibility and/or sanctions) may subsequently result.

Sanctions

The following are possible sanctions that may be assigned after a finding of Responsibility. This list is not exhaustive and may be modified to meet any particular case's particular circumstances.

1. Expulsion: Permanent severance of the student's relationship with the College. This severance includes being barred from campus.
2. Disciplinary Suspension: Temporary severance of the student's relationship with the College for a specified period of time. This may include the student being barred from campus.
3. Limited Suspension: A student may be denied certain privileges for a specified period of time. These privileges may include, but are not limited to, class attendance, participation in internships, and access to institutional facilities.
4. Disciplinary Probation: Notice to the student that any further, major disciplinary violation may result in suspension. Disciplinary probation might also include one or more of the following: setting restrictions or issuing a reprimand.
5. Reprimand (either oral or written).
6. Counseling: The committee may require that a Respondent seek counseling for issues including, but not limited to, anger management, substance abuse, and extenuating personal circumstances. The Respondent's counselor may confirm participation but not the content of the meetings.
7. Work assignment changed.
8. Referral to Human Resources for employment action.

GRIEVANCE PROCEDURES

Record Keeping

Title IX Records will be maintained for 7 (seven) years [See §106.45 (b)(10)] and in accordance with the College's Records Retention Policy. Title IX records include:

1. Investigations
2. Determinations
3. Recordings
4. Transcripts
5. Sanctions
6. Remedies
7. Appeals
8. Informal Resolutions
9. Training Materials

Examination and Revision

The policies of Gratz College are reviewed regularly. The Gratz College Sexual Misconduct Policy may be revised at any time in order to comply with current applicable guidance, regulations, and laws.



Resources

SEXUAL VIOLENCE

**Victim Services Center at
Montgomery County:**
1-888-521-0983 (24/7 hotline)

**Philadelphia Police Department
Special Victims Unit:**
215-685-3251 or 911

**Philadelphia Domestic Violence
Hotline:**
1-866-723-3014

**Women Organized Against Rape
(WOAR):**
215-985-3333

HATE CRIME

**Federal Bureau of Investigation
(FBI):**
215-418-4000

DOMESTIC VIOLENCE

Laurel House:
1-800-642-3150, 610-277-1860

Women's Center:
1-800-773-2424

Legal Aid:
1-855-980-6924

**Women's Center of Montgomery
County:**

Elkins Park: 215-635-7344
Norristown: 610-279-1548
Pottstown: 610-970-7363
Bryn Mawr: 610-525-1427
Colmar: 215-996-0721

**National Domestic Violence
Hotline:**
1-800-799-SAFE (7233),
1-800-787-3224 (TTY)

ALL EMERGENCIES

**Cheltenham Police
Department:**
215-885-1600 or 911

TIMELY WARNINGS

The purpose of a timely warning is to notify the Gratz community of the incident and to provide information that may enable community members to protect themselves from similar incidents better. Timely warnings cover those crime categories required in the Annual Report.

Per the Clery Act, timely warnings must be issued for the following crimes, if (1) the crime is reported to campus security authorities, who are identified on page 5 of this report, (2) the crime is determined to pose a serious or continuing threat to Gratz students and employees, and (3) the crime occurred on campus, in or on non-campus buildings or property owned by Gratz College, or owned or controlled by a student organization officially recognized by Gratz, or on public property that is within the campus or immediately adjacent to campus:

Timely warnings can be issued for threats to property, as well as for threats to persons. It is irrelevant whether the victims or perpetrators are members of the Gratz community.

The warning should be issued as soon as the pertinent information is available. A timely warning intends to alert the Gratz community to continuing threats, especially concerning safety, thereby enabling community members to protect themselves.

Warnings are distributed through Gratz College's emergency alert system. A combination of dissemination methods may also be used. Timely warnings may not be issued in a manner or posted in a location that requires the campus community to request them or search for them.

If a situation arises, either on or off-campus, that, in the judgment of a designated security team member, constitutes an ongoing or continuing threat, a campus-wide “timely warning” will be issued. The warning will be issued through the “Emergency Alert System.” Anyone with information warranting a timely warning should report the circumstances to a designated Security Personnel by phone at 215-635-7310 or in person.

TIMELY WARNINGS



CRITERIA TO ISSUE A TIMELY WARNING

Arson
Aggravated Assault
Criminal Homicide Robbery
Burglary
Rape
Fondling
Incest
Statutory Rape
Hate Crimes

EMERGENCY ALERT SYSTEM

The Emergency Alert System allows students, parents, faculty, and staff to submit their individual email, pager, or cell phone number with text messaging capabilities and service for immediate notification. All emergency communications will be dispatched via Everbridge in an emergent or urgent situation.

Everbridge will send an e-mail or text message to a cell phone or other device. Subscribers will have a choice in their means of receiving their emergency information. The Emergency Alert System will only be used in emergencies and severe weather situations. If you receive an alert, you will be instructed to visit your Gratz College email, the Gratz College website, Message on the Main Phone System, and local radio and television stations for further instruction. In the event of system testing, an email will be sent out via Gratz College email before the notification system test.

FERPA does not preclude an institution's compliance with the timely warning provision of the campus security regulations. FERPA recognizes that information can be released without consent when needed to protect the health and safety of others in case of an emergency. Also, if institutions utilize information from a campus law enforcement unit's records to issue a timely warning, FERPA is not implicated, as FERPA does not protect those records.

Gratz College is not required to report crime statistics or issue timely warnings for Clery-designated crimes that occur off-campus, except for those committed on public property or in (on) *non-campus buildings or property*, as defined in the report. However, the College recognizes that timely warnings, even if not required by the Clery Act, may benefit the campus community in certain cases. The following criteria must be met for the College to issue a timely warning for an off-campus crime that does not require a timely warning under the Clery Act.

- The crime is a murder, rape, or other serious and violent assault, or the local municipality requests that the College issue a timely warning.
- The crime occurred in a geographic area frequented by Gratz College students. The crime represents a
- continuous threat to the Gratz College campus community.

Sign up for Emergency Alerts at: [Gratz College Emergency Alert Form](#)

BUILDING SECURITY AND ACCESS POLICY

Building Access

Gratz College's business hours Mondays through Thursdays 9:00 am to 5:30 pm, and Fridays 9:00 am to 3:00 pm. Days and times may vary due to holidays, on-campus events, on-campus classes, and other unforeseen circumstances.

During business hours, Gratz College will be open to students, parents, employees, contractors, guests, and invitees. During non-business hours, access to the building is by key and security code, if issued, or by admittance via designated officials. In the case of periods of extended closing, Gratz College will admit only those with prior written approval.

Emergencies may necessitate changes or alterations to any posted schedules for building hours. In such emergencies, admittance to the closed building may be permitted by an authorized employee only.

Building Security Alarm

The Academic Building is equipped with three alarm systems:

- 1. Silent Alarm System:** This is a system of “panic buttons,” some of which are located at fixed points in the building. The “panic buttons” are to be used only in emergencies and provide notification directly to the Cheltenham Police Department. When used, the Cheltenham Police Department will respond immediately with weapons drawn.
- 2. Security Alarm System:** This is a system consisting of fixed panels located within the building. This system is activated by breaches in the system, motion detectors, and manually pushing a button. Once activated, the system provides both an audible and visual warning on the premises. Both a security company and the Cheltenham Police Department are notified that the system has been activated.
- 3. Fire Alarm System:** This system detects smoke with the result, the system is activated. Once activated, the system provides both an audible and visual warning on the premises and the Cheltenham Fire Department is notified that the system has been activated.

Please note: All emergency doors must remain closed unless there is an emergency.

BUILDING SECURITY AND ACCESS POLICY

Procedures for Building Access

The employees who have the authorization to open and lock the building will follow the following procedures.

Opening of the Building

- The employee will disarm the building; doors will remain closed until the Front Desk employee arrives. The employee will walk the premises of the building to assure that the building is safe to open.
- Once the building has been confirmed safe, the employee will wait at the Front Desk for the Front Desk employee to allow them to enter the building.
- Once the Front Desk employee arrives, the front door will be unlocked. No one will be admitted into the building unless a Front Desk employee is present.

During Business Hours

- Any person without an access ID Badge will only be given access to the building once they have confirmed the following through the intercom:
 - Reason for Visit
 - Identification
- During large events and/or workshops, the intercom policy may change.
- **Visitors, Contractors, and invitees:** Once in the building, the person(s) must sign in at the front desk, show identification, and collect a visitor's pass that must be worn visibly during their visit.
- No visitor will be allowed access to the rest of the building unless their designated person is aware of their presence.
- Once the visitor's visit is complete, they must sign out and return the visitor's pass.

Closing of the Building

- At the time of closing, Maintenance personnel will walk the building's premises, confirming that no one is remaining in the building and that the necessary doors are locked and secure. Once the building has been secured, the Alarm will be activated, and the Front Desk Employee and Maintenance will leave the premises.

BUILDING SECURITY AND ACCESSPOLICY

Off-Campus Student Organizations

Gratz College does not recognize any off-campus student organizations. Off-campus activities involving students will be supervised by appropriate staff to notify local law enforcement authorities if a crime occurs. Supervisors of these events should also notify Gratz College's Manager of Business Operations and Facilities of these incidents. Still, Gratz College personnel do not have the authority to respond to off-campus incidents.

Building Maintenance

In conjunction with the Jewish Federation of Greater Philadelphia, the Gratz College Maintenance Department maintains the building and grounds with a concern for safety and security. Reports of potential safety hazards, such as broken windows, should be made to the Maintenance Department at (215) 635-7300, ext. 195, or the Reception Desk at ext. 100.

Weapons On-Campus

No students, faculty, staff, or visitors to the facility can possess weapons on campus if security personnel are hired for a particular event or respond to a particular issue, only trained and licensed professionals are authorized to possess weapons.



ADDICTION

Addiction is a treatable, chronic medical disease involving complex interactions among brain circuits, genetics, the environment, and an individual's life experiences. People with addiction use substances or engage in behaviors that become compulsive and often continue despite harmful consequences. Prevention efforts and treatment approaches for addiction are generally as successful as those for other chronic diseases.

*American Society of Addiction Medicine (ASAM)
Definition of Addiction*

CAMPUS DRUG POLICY

Drug-Free Campus Policy

As an educational institution participating in various federal financial aid programs, Gratz College and its employees and students are subject to the Drug-Free Schools and Communities Act Amendments of 1989, 34CFR Part 86, Subpart B (collectively, the “Acts”).

Both the Acts and Gratz College policy prohibit the misuse, illicit use, unlawful manufacture, possession, sale, or other illicit activity involving controlled/illegal drugs and intoxicating beverages by any student on school property or on-premises used for school functions.

Any student found possessing illegal drugs, misusing intoxicating beverages, or selling controlled/illegal drugs on school property or at any school function will be subject to disciplinary action, including expulsion, and the matter may be referred to the proper authorities for possible prosecution.

School property is defined as Gratz College property (including desks, lockers, offices, restrooms, classrooms, break areas, etc.) made available only to students for school-related purposes. School property may be searched or inspected at any time without the students’ consent or knowledge.

This document serves to inform you about the College’s policies on alcohol and other drugs. The abuse of alcohol and the use of illegal drugs are inconsistent with our institution's academic goals.

To assist the campus community, Gratz College hopes to accomplish the following:

- Establish and enforce clear policies for employees and students that promote an educational environment free from the abuse of alcohol and the use of illegal drugs;
- Educate all members of the campus community about the health risks associated with the use of illegal drugs and the abuse of alcohol;
- Create a campus environment that promotes and reinforces healthy, responsible living and respect for community and campus standards and regulations;
- Provide a reasonable level of care for alcohol abusers and users of illegal drugs and those affected by it.

CAMPUS ALCOHOL POLICY

Alcohol Beverage Campus Policy

The consumption of alcoholic beverages on campus or in any building owned, managed, or operated by Gratz College is prohibited. The exception is when Gratz College sanctions an activity and allows alcoholic beverages to be served.

Purchase and Consumption of Alcohol

In compliance with Pennsylvania state law, alcohol must be served in a controlled manner and not be freely accessible. No one under the age of 21 or visibly intoxicated may be served.

Alcohol must not leave the University event venue.

Mixed drinks/cocktails are not permitted to be served by student organizations.

Alcohol at Events

The Events Coordinator's Office must approve Gratz College-sanctioned events being held on campus. If alcohol is served, beverages will be limited to beer and/or wine, and the event must meet the following requirements:

- Student groups wishing to serve alcohol must request at least three weeks in advance of the event. Requests are submitted to the Events Coordinator's Office after confirmed approval from the Dean of the College. Alternative, non-alcoholic beverages and food must be served during the entire period that alcoholic beverages are available.
- The amount of alcohol is regulated through the Event Coordinator's Office. Alcohol may not be purchased, distributed, or sold on campus by students at a Gratz College-sanctioned event.
- A bartender(s) is required for all approved events. The event's size determines the number of bartenders; the rationale is one bartender for each count up to 125 guests. The bartender fee (as determined by the caterer in advance of the event) is the event organizer's responsibility (s). It is the organizer's responsibility to collaborate with the Event Coordinator in advance of the event.
- Kegs, vats, and other large-scale containers of alcoholic beverages are not permitted. Students' events must have a designated responsible contact. A responsible contact can be a faculty or staff member prepared to assume responsibility for a controlled and successful event.



Resources for Chemical Dependencies and Abuse

The following resources are available for assisting those with possible problems of chemical dependencies and abuse:

- Find Treatment at Substance Abuse and Mental Health Services Administration (SAMHSA) at samhsa.gov or call 1-800-662-HELP(4357)
- National Drug Helpline at 1-844-289-0879. The hotline is private and confidential help from trusted professionals' day and night.
- Narcotics Anonymous at 1-844-624-3575 (1-844-NAHELPLINE) or www.na.org.
- American Addiction Centers at 1-888-744-0069 or www.drugabuse.com. The helpline is available 24/7 and is offered at no cost, with no obligation to enter into treatment.

The SAMHSA Drug-Free Workplace Helpline provides confidential, practical, impartial, and up-to-date information, advice, and support free of charge to employees and their families. Topics cover a wide range of issues related to federal and non-federal Drug-Free Workplace Programs and drug testing. Contact the helpline at 1-800-WORKPLACE (967-5752) or email at dwp@samhsa.hhs.gov.



Resources for Alcohol Abuse

The following resources are available for assisting those with possible problems of alcohol abuse.

Codependency Anonymous (CODA) at 1-888-444-2359 or www.coda.org. CODA provides information on local meetings. This organization promotes the development of healthy relationships and a 12-Step orientation.

Alcoholics Anonymous (AA) at 215-623-7900 or 856-486-4444 (South Jersey) or www.aa.org. AA provides lists of local meetings, meeting times, types of meetings (open vs. closed, etc.). The meetings follow the 12-Step model of recovery.

Adult Children of Alcoholics (ACOA) at 215-333-0444 or www.adultchildren.org. ACOA provides a 12-step program/support group for people who grew up in alcoholic or otherwise dysfunctional homes.

Find Treatment at Substance Abuse and Mental Health Services Administration (SAMHSA) at samhsa.gov or call 1-800-662-HELP (4357).

American Addiction Centers at 1-888-744-0069 or www.drugabuse.com.

College Drinking (Changing the Culture):
www.collegedrinkinglevelup.gov/parentsandstudents

College Binge Drinking: collegebingedrinking.net

Rethinking Drinking: www.rethinkingdrinking.niaaa.nih.gov

CLERY GEOGRAPHY

Clery Geography is the geographic area for which an institution is responsible for disclosing crime statistics. The following definitions describe the areas that cumulatively account for an institution's Clery Geography.

On Campus

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls. Also, any building or property within or reasonably contiguous to the area identified in the first part of this definition owned by the institution but controlled by another person is frequently used by students and supports institutional purposes (such as food or another retail vendor).

On Campus in Residential Halls

Dormitories or other residential facilities for students on campus" are a subset of the on-campus category. Institutions must disclose the total number of on-campus crimes, including dorms or other residential facilities for students on campus. They must also make a separate disclosure limited to the number of crimes occurring in student dorms or residential facilities on campus. As a subset, the number of crimes reported for dormitories or other residential facilities must be less than or equal to the number of reported crimes for the on-campus category.

Gratz College does not have dormitories or residential facilities for students on campus.

Non-Campus Property

Any building or property owned or controlled by a student organization that the institution officially recognizes or any building or property owned or controlled by an institution that is used in direct support of, or concerning, the institution's educational purposes is frequently used by students and is not within the same reasonably contiguous geographic area of the institution.

Public Property

All public property, including thoroughfares, streets, sidewalks, and parking facilities within the campus or immediately adjacent to and accessible from the campus.

CLERY ACT CRIMES

Definitions and crimes reportable under the Clery Act.

Murder / Non-Negligent Manslaughter

The willful (non-negligent) killing of one human being by another. Also included are any deaths caused by injuries received in a fight, argument, quarrel or the commission of a crime.

Manslaughter by Negligence

The killing of another person through gross negligence. Gross negligence is defined as something that a reasonable and prudent person would not do.

Forcible Sex Offenses

- **Forcible Rape-** The carnal knowledge of a person, forcibly and/or against that persons will; or forcibly or against the persons will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity
- **Forcible Sodomy-** Oral or anal sexual intercourse with another person, forcibly and/or against that person's will; or not forcibly against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.
- **Sexual Assault With an Object-** The use of an object or instrument to unlawfully penetrate, however slight, the genital or anal opening of the body of another person, forcibly and/or against the person's will; or not forcibly or against the person will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.
- **Forcible Fondling-** The touching of the private parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

Non-forcible Sex Offenses

- **Incest** - Non-forcible sexual intercourse between two persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape** - Non-forcible sexual

CLERY ACT CRIMES

Domestic Violence

Abuse between family or household members.

- The law defines family and household members as spouses or former spouses, adults related by blood, persons cohabitating or who had cohabitated, persons in the past or present sexually intimate relationship or unmarried parents of a child.
- Abuse is the occurrence of one or more of the following acts:
 1. Attempting to cause or causing (with or without a deadly weapon)
 - i. Bodily injury
 - ii. Rape
 - iii. Involuntary deviate sexual intercourse (oral sex, anal sex, vaginal or anal penetration with a foreign object performed under force or the threat of force or while unconscious.
 - iv. Sexual assault
 - v. Aggravated indecent assault (vaginal or anal penetration with a finger for arousal purposes without consent, under force or threat of force, or while the person is unconscious.
 - vi. Incest
 2. Placing another in reasonable fear or immediate serious bodily injury.
 3. False imprisonment.
 4. Physical or sexual abuse of a child.
 5. Engaging in conduct or repeatedly committing acts towards another person, including following the person, under circumstances that place the person in reasonable fear of bodily injury.

Stalking

A person commits the crime of stalking when the person either:

- Engages in a course of conduct or repeatedly commits acts towards another person, including following the person without proper authority, under circumstances that demonstrate either intent to place such other persons in reasonable fear of bodily injury or cause substantial emotional distress persons.
- Engages in a course of conduct or repeatedly communicates to another person under circumstances which demonstrates or communicates either intent to place such persons in reasonable fear of bodily injury or to cause substantial emotional distress to such other persons.

CLERY ACT CRIMES

Dating Violence

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

For the purposes of the definitions:

- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such
- abuse. Dating violence does not include act covered under definition of domestic violence.
- For the purposes of complying with the requirements of this section, any incident meeting of this definition is considered a crime for the purpose of the Clery Act reporting.

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.

Burglary

The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony, breaking and entering with intent to commit larceny, housebreaking, safe cracking and all attempts to commit any of the aforementioned.

Motor Vehicle Theft

The theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on the surface and not on rails. Motorboats, construction equipment, airplanes, and farming equipment are specifically excluded from this category.

CLERY ACT CRIMES

Aggravated Assault

An unlawful attack by one person upon another to inflict severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Simple assaults are excluded.

Arrest

Persons processed by arrest, citation, or summons.

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.

Note that only fires determined through investigation to have been willfully or maliciously set are classified as arsons. Arson is therefore the only Clery Act offense that must be investigated before it can be disclosed. If other Clery Act offenses were committed during the arson incident, the most serious is counted in addition to the arson.

Category of Fire

For HEA purposes, there are three categories of fire:

- **Unintentional Fire:** A fire that does not involve an intentional human act to ignite or spread a fire into an area where the fire should not be.
- **Intentional Fire:** A fire ignited or resulted from deliberate action in circumstances where the person knows there should not be a fire.
- **Undetermined Fire:** A fire in which the cause cannot be determined.

Cause of Fire

The factor or factors that give rise to a fire. The causal factor may be, but is not limited to, the result of an intentional or unintentional action, mechanical failure or act of nature.

CLERY ACT CRIMES

Weapon Law Violations

The violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as:

- Manufacture, sale, or possession of deadly weapons. Carrying
- deadly weapons, concealed or openly.
- Aliens possessing deadly weapons.
- Furnishing deadly weapons to minors.
- All attempts to commit any of the aforementioned.

Drug Abuse Violations

Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include, but are not limited to:

- Opium or cocaine and their derivatives (morphine, heroin, codeine.) Marijuana
- Synthetic narcotics (Demerol, methadone.)
- Dangerous non-narcotic drugs (barbiturates, Benzedrine.)

Liquor Law Violations

The violations of laws or ordinances prohibiting:

- The manufacture, sale, transportation, furnishing, and possessing intoxicating liquor.
- Maintaining unlawful drinking places.
- Bootlegging or operating a still.
- Furnishing liquor to a minor or intemperate person.
- Using a vehicle for illegal transportation of liquor.
- Drinking on a train or public conveyance.
- All attempts to commit any of the aforementioned.

CLERY ACT CRIMES

Hate Crimes

A Hate Crime is a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim.

The law requires the release of statistics, by category, of prejudice concerning the occurrence of hate crimes in the crime classification listed in all the aforementioned categories, as well as larceny-theft, simple assault, intimidation, destruction, damage, or vandalism of property, or crime involving bodily injury to any person in which the victim is selected because of the actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability of the victim.

The definitions of additional hate crime categories are as follows:

- **Larceny Theft-** The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession, of another.
- **Intimidation (threats)-** Intimidation, which includes stalking, unlawfully places 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, or vandalism of property-** To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the owner's consent or the person having custody or control of it.
- **Simple Assault-** An unlawful physical attack by one person upon another where neither the offender nor the victim displays a weapon. The victim suffers obvious severe or serious bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

HATE BIASES

Race/Ethnicity/Ancestry

Anti-American Indian or Alaska Native
Anti-Arab
Anti-Asian
Anti-Black or African American,
Anti-Hispanic or Latino
Anti-Multiple Races, Group
Anti-Native Hawaiian or Other Pacific Islander
Anti-Other Race/Ethnicity/Ancestry
Anti-White

Religion

Anti-Buddhist
Anti-Catholic
Anti-Eastern Orthodox (Russian, Greek, Other)
Anti-Hindu
Anti-Islamic
Anti-Jehovah's Witness
Anti-Jewish
Anti-Mormon
Anti-Multiple Religions, Group
Anti-Other Christian
Anti-Other Religion
Anti-Protestant
Anti-Sikh
Anti-Atheism/Agnosticism, etc.

Sexual Orientation

Anti-Bisexual
Anti-Gay (Male)
Anti-Heterosexual
Anti-Lesbian
Anti-Transgender (Mixed Group)

Disability

Anti-Mental Disability
Anti-Physical Disability

Gender

Anti-Male
Anti-Female

Gender Identity

Anti-Transgender
Anti-Gender Non-Conforming

ON-CAMPUS CRIMINAL OFFENSES

Criminal offense

Total occurrences On campus

	2021	2022	2023
a. <u>Murder/Non-negligent manslaughter</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Manslaughter by Negligence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
d. <u>Fondling</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
e. <u>Incest</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
f. <u>Statutory rape</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
g. <u>Robbery</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
h. <u>Aggravated assault</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
i. <u>Burglary</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
k. <u>Arson</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

PUBLIC PROPERTY CRIMINAL OFFENSES

Criminal offense

Total occurrences on Public Property

	2021	2022	2023
a. <u>Murder/Non-negligent manslaughter</u>	0	0	0
b. <u>Manslaughter by Negligence</u>	0	0	0
c. <u>Rape</u>	0	0	0
d. <u>Fondling</u>	0	0	0
e. <u>Incest</u>	0	0	0
f. <u>Statutory rape</u>	0	0	0
g. <u>Robbery</u>	0	0	0
h. <u>Aggravated assault</u>	0	0	0
i. <u>Burglary</u>	0	0	0
j. <u>Motor vehicle theft</u> (Do not include theft from a motor vehicle)	0	0	1
k. <u>Arson</u>	0	0	0

Criminal offense

Occurrences of Hate crimes (Category of Bias for crimes)

[illegible]

PUBLIC PROPERTY HATE CRIMES

YEAR 2023

[illegible]

ON-CAMPUS VAWA OFFENSES

Crime

Total occurrences On Campus

	2021	2022	2023
a. <u>Domestic violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Dating violence</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Stalking</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

PUBLIC PROPERTY VAWA OFFENSES

Crime	Total occurrences on Public Property		
	2021	2022	2023
a. <u>Domestic violence</u>	<div>0</div>	<div>0</div>	<div>0</div>
b. <u>Dating violence</u>	<div>0</div>	<div>0</div>	<div>0</div>
c. <u>Stalking</u>	<div>0</div>	<div>0</div>	<div>0</div>

ON-CAMPUS ARRESTS

Crime	Number of Arrests		
	2021	2022	2023
a. <u>Weapons: carrying, possessing, etc.</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
b. <u>Drug abuse violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
c. <u>Liquor law violations</u>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>

PUBLIC PROPERTY ARRESTS

Crime	Number of Arrests		
	2021	2022	2023
a. <u>Weapons: carrying, possessing, etc.</u>	0	0	0
b. <u>Drug abuse violations</u>	0	0	1
c. <u>Liquor law violations</u>	0	0	0

ON-CAMPUS DISCIPLINARY ACTIONS

Crime

Number of persons referred for
Disciplinary Action

2021

2022

2023

a. Weapons: carrying, possessing, etc.

0

0

0

b. Drug abuse violations

0

0

0

c. Liquor law violations

0

0

0

PUBLIC PROPERTY DISCIPLINARY ACTIONS

Crime

Number of persons referred for
Disciplinary Action

2021

2022

2023

a. Weapons: carrying, possessing, etc.

0

0

0

b. Drug abuse violations

0

0

0

c. Liquor law violations

0

0

0

UNFOUNDED CRIMES

	Number		
	2021	2022	2023
a. <u>Total unfounded crimes</u>	0	0	0