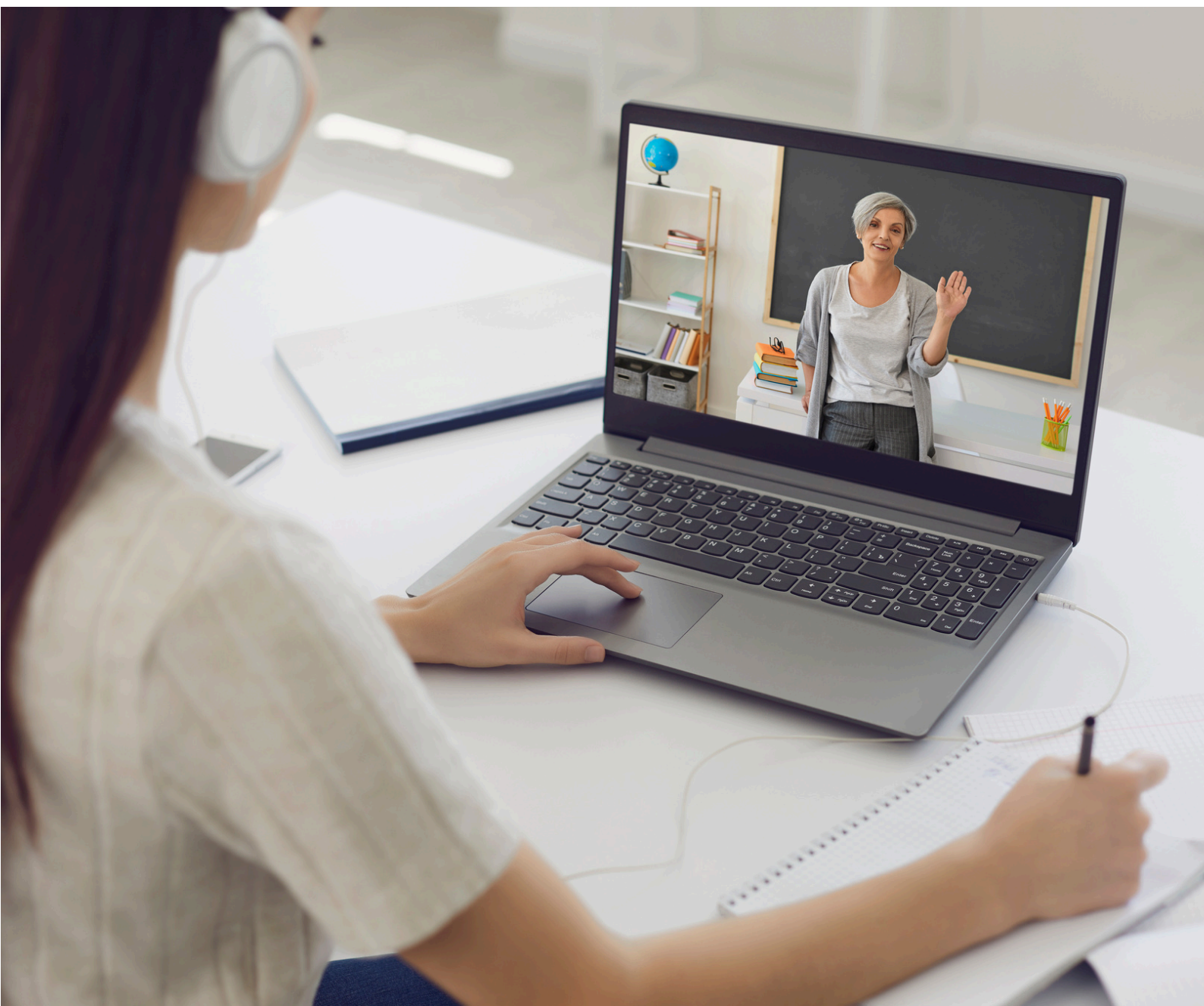
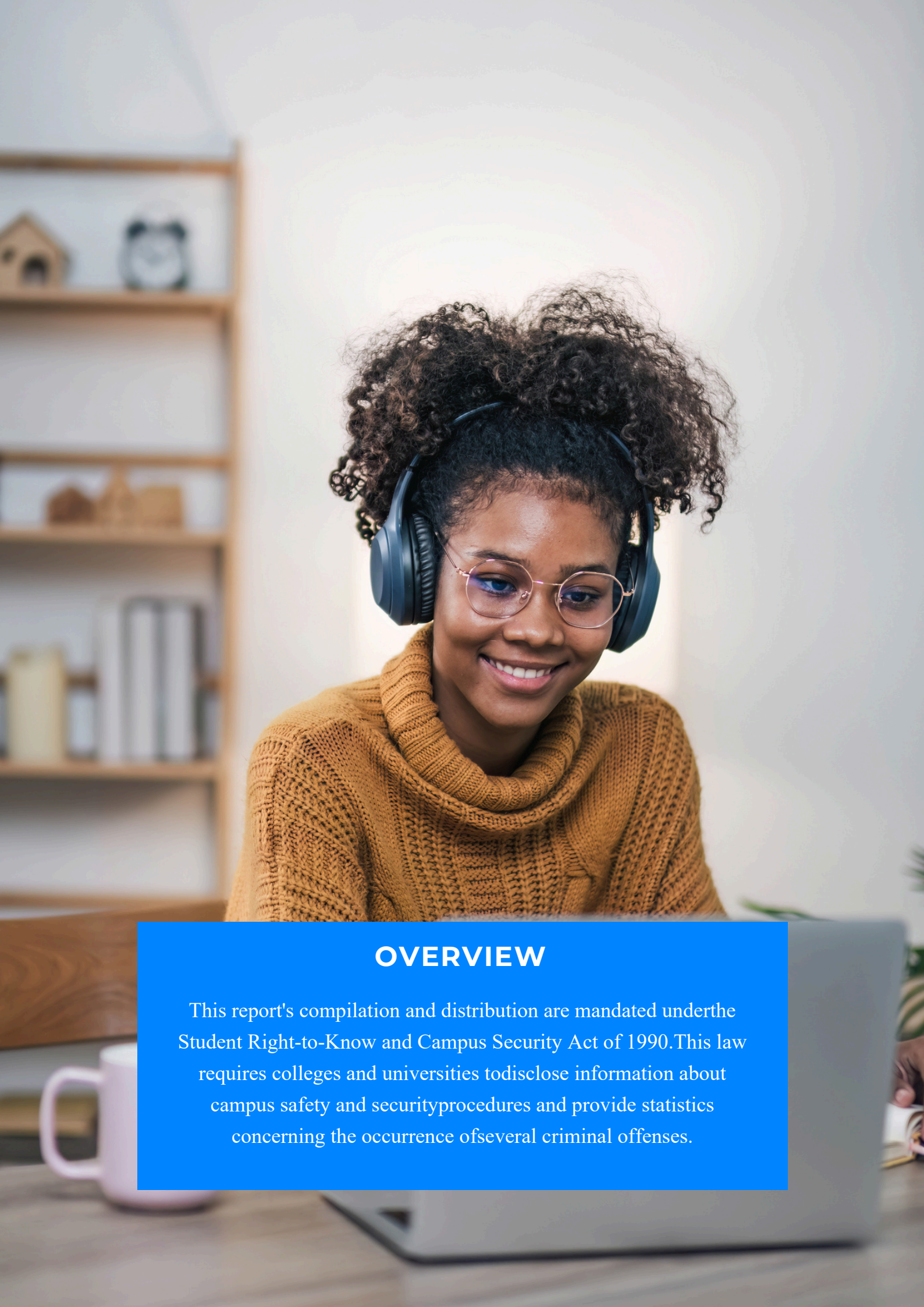




CAMPUS SECURITY



2025 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

About Gratz College

Gratz College provides a pluralistic education that fosters both professional growth and personal enrichment. The College offers graduate and undergraduate degrees, certificate programs, and lifelong learning opportunities for adults and teens. Through strong partnerships, Gratz continues to strengthen academic and institutional relationships in Philadelphia, across North America, and around the world. Many of its programs reflect the College's historic leadership in Jewish studies and education. With a broad commitment to serving diverse communities, Gratz College creates access for students everywhere to become leaders in their professions and communities.

Campus Locations & Timeline

Gratz College has expanded its educational presence over time. The following campus locations are covered under this Annual Security Report and its three-year statistical disclosures:

Mandell Campus

7605 Old York Road

Melrose Park, PA 19027

(Primary location through 2024)

Bala Campus

382 Bala Avenue

Bala Cynwyd, PA 19004

(Opened in 2025)

Jenkintown Campus

315 York Road

Jenkintown, PA 19046

(Opened in 2025)

As new campuses have been added, security reporting has been updated accordingly. This ensures that all current and former Gratz College facilities are represented within the required three-year reporting period, in alignment with Clery Act guidance.

Compliance with Federal and State Requirements

As a recipient of federal Title IV student financial aid, Gratz College complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Clery Act requires all postsecondary institutions receiving Title IV funding to publish an Annual Security Report (ASR) that includes campus security policies and three years of select crime statistics.

This report has been prepared by the Gratz College Campus Security Authorities (CSAs), in collaboration with local law enforcement agencies and various college offices, including the Office of Academic Affairs and the Office of the President. The report is made available to students, faculty, staff, prospective students and employees, and the wider community.

This publication is distributed in compliance with:

- Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
- Section 486(e) of Public Law 105-244
- Accuracy in Campus Crime Reporting Act of 1997
- Pennsylvania College and University Security Information Act

Message from the Director of Campus Security

Dear Gratz College Community,

As your Director of Campus Security, I want to reaffirm that your safety and well-being remain our highest priorities. Our mission extends beyond securing our campuses—it is about fostering a welcoming and supportive environment where every member of the Gratz community feels safe, respected, and empowered to thrive.

This year's Annual Security Report reflects important updates, including:

- The expansion of Gratz College to Bala Cynwyd and Jenkintown,
- New partnerships with Lower Merion Township Police and Jenkintown Borough Police, alongside our ongoing collaboration with Cheltenham Township Police and Montgomery County Public Safety,
- Enhancements to building security systems, emergency procedures, and safety training programs.

These initiatives strengthen our commitment to providing a secure learning environment where students, faculty, and staff can focus on teaching, learning, and personal growth with confidence.

I encourage you to:

- Read this report carefully to understand our policies and procedures,
- Familiarize yourself with resources for reporting emergencies or concerns,
- Participate in safety programs and trainings offered throughout the year, and
- Report incidents promptly to Campus Security Authorities (CSAs) or local law enforcement.

Your active partnership helps us maintain a safe, inclusive, and supportive community. Together, we embody the values that make Gratz College such a unique and inspiring place to study and work.

Thank you for your trust, your vigilance, and your shared commitment to campus safety.

Warmly,
Suzette Martinez-Quiles
Director of Campus Security, Gratz College
Campus Security: 215-635-7310
campussecurity@gratz.edu
www.gratz.edu/campus-security

THE CLERY ACT

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, commonly known as the Clery Act, is a federal law requiring all colleges and universities participating in federal student aid programs to disclose both 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 in 1986. At that time, no standards for campus crime reporting existed, and her parents, Connie and Howard Clery, could not have known the risks she faced. In response to this tragedy, the Clerys became leading advocates for change on two critical fronts:

- **Policy Reform:** On Capitol Hill, they successfully lobbied for new laws that would establish nationwide requirements for campus crime reporting, ultimately leading to the Clery Act. For the first time in U.S. history, families, students, educators, and policymakers could engage in an open dialogue about campus safety.
- **Campus Safety Advocacy:** Connie and Howard also founded a nonprofit organization dedicated to preventing campus violence. Today, that organization—the Clery Center—continues to support higher education institutions in implementing effective safety measures.
- Learn more at [Clery Center](#).

Under the Clery Act, Gratz College must provide students, faculty, staff, and prospective community members with:

- **Annual Security Reports (ASRs):** Published by October 1 each year, containing three years of campus crime statistics and security policies.
- **Timely Warnings and Emergency Notifications:** Alerts about crimes or threats that pose a serious or continuing danger to the campus community.
- **Daily Crime Log:** Maintained by campus security for public inspection.

Gratz College ensures that security policies, procedures, and statistical information are readily available to all members of the College community and to prospective students and employees upon request.



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 Right-to-Know Act and the Clery Act require institutions to disclose statistics for crimes reported both to criminal justice agencies and to designated campus community members. At Gratz College, this includes crime data provided by local law enforcement partners such as:

- Cheltenham Township Police Department
- Lower Merion Township Police Department
- Jenkintown Borough Police Department

While all community members are strongly encouraged to report crimes, certain individuals at the College are formally designated as Campus Security Authorities (CSAs).

The term “Campus Security Authority” is broader than it sounds. It applies to a group of individuals who may not be engaged directly in law enforcement, but who have significant responsibility for student and campus activities. According to the Clery Act, any person with the authority and duty to take action or respond to particular issues on behalf of the College—or who has significant responsibility for student and campus activities—is considered a CSA.

Important Notes:

- CSAs do not have law enforcement powers and are not authorized to carry firearms or make arrests.
- Local police are contacted when an arrest or formal criminal investigation is appropriate.
- Gratz College also coordinates with outside police agencies for additional security during special events.

Current Partnerships

Gratz College collaborates closely with Cheltenham Township Police, Lower Merion Township Police, Jenkintown Borough Police, Cheltenham Emergency Management, and Montgomery County Emergency Management. At present, there are no written memoranda of understanding (MOUs) between these agencies and the College, but information sharing and cooperation occur regularly.



DESIGNATED CSA AT Gratz College

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, Facilities or maintenance staff.

Based on job responsibilities, the following positions have been identified as Campus Security Authorities:

- President of the College and all subordinate administrators
- Dean of the College and all subordinate administrators
- Director of Campus Security and all subordinate administrators
- Manager of Business Operations and Facilities and all subordinate administrators
- Directors of Student-Facing Programs, Advisors to Student Organizations, and Event Coordinators (including those at satellite campuses)
- Any contracted or temporary event security personnel engaged by the College

ANNUAL SECURITY REPORT

Preparation of the Annual Security Report (ASR)

The Director of Campus Security prepares the Annual Security Report (ASR) of crime statistics and security policies in compliance with the Clery Act. All colleges and universities receiving Title IV federal student aid are required to publish the ASR by October 1 of each year.

The ASR includes:

- Three years of campus crime statistics collected from Gratz College personnel and local law enforcement agencies,
- Security policy statements, including policies on reporting crimes, sexual misconduct, victims' rights, and other federally required topics.

Distribution of the ASR

- By October 1, all enrolled students, faculty, and staff receive an email notification with the direct link to the latest ASR.
- The report is posted publicly at: www.gratz.edu/campus-security.
- Printed copies are available upon request from the Office of Campus Security.
- Prospective students and employees are informed of the report's availability and can access it on the website or by request.
- A copy of the statistics is also submitted annually to the U.S. Department of Education and can be accessed online at [Campus Safety and Security Data Analysis Tool](#).

Important Note on Crime Definitions

Please note that the Clery Act definitions of crimes may differ from those contained in the Pennsylvania State Penal Code. For purposes of this report, Gratz College uses the federal Clery Act definitions to ensure consistency in reporting. A full list of Clery Act crime definitions is included in this report.

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

ANNUAL SECURITY REPORT

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 (CSA).

The U.S. Department of Education defines a CSA as:

1. A campus law enforcement unit;
2. An individual or organization specified in an institution's statement of campus security policy as the person or office with significant responsibility for student and campus activities; and
3. Any other individual with the authority and duty to act or respond to particular issues on behalf of the institution.

It is important to note that CSAs are not limited to security staff or police. Faculty and staff who oversee student activities, serve as advisors, or manage programs may also be considered CSAs. Conversely, individuals whose responsibilities are strictly administrative, clerical, or maintenance-related are generally not considered CSAs.

At Gratz College, CSAs play a critical role in ensuring compliance with the Clery Act by helping to:

- Encourage community members to report crimes and safety concerns;
- Ensure that crime statistics are accurately captured for annual reporting;
- Connect individuals with appropriate resources, including Campus Security and local law enforcement.

CSA Reference at Gratz College

Examples of CSAs at Gratz:

- President and Dean of the College
- Director of Campus Security and subordinate administrators
- Advisors to student organizations and student-facing program directors
- Registrar, Student Records staff, and Enrollment Management staff
- Event security personnel and contracted security for special events

Examples of roles not considered CSAs at Gratz:

- Administrative support staff without student oversight responsibilities
- Business office and billing staff (unless supervising student employees)
- Library, IT, or facilities staff whose responsibilities do not include student activity oversight

By identifying and training CSAs, Gratz College ensures that crime reporting is accurate, transparent, and timely, in accordance with federal law.

POLICY STATEMENT

Sexual Misconduct Policy

It is the policy of Gratz College (“Gratz” or the “College”) to maintain an environment that is free of all forms of discrimination and harassment, including sexual misconduct.

Who Is Covered by the Policy

This Policy applies to all members of the Gratz College community, including:

- Students
- Faculty
- Administrators and staff
- Volunteers
- Vendors and contractors
- Visitors
- Individuals regularly or temporarily employed, conducting business, studying, or otherwise engaged in official activities with the College or on College property

Prohibited Conduct

The College strictly prohibits all forms of:

- Sexual harassment and discrimination
- Gender-based harassment and discrimination
- Sexual assault
- Domestic violence
- Dating violence
- Stalking
- Retaliation against any person who, in good faith, reports or participates in an investigation of prohibited conduct

All of the above are referred to collectively as “*Prohibited Conduct*.”

POLICY STATEMENT

Sexual Misconduct Policy

Non-Discrimination Statement

Gratz College does not discriminate on the basis of sex in its educational programs, extracurricular activities, or employment practices. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, which 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 VII of the Civil Rights Act of 1964, as well as other applicable federal and state statutes.

This Policy prohibits sexual harassment against Gratz College community members of any sex, gender identity, or gender expression, in both educational and employment contexts. It also prohibits gender-based harassment that does not involve conduct of a sexual nature.

Handling of Complaints

- Sexual harassment cases involving two employees may be handled under Title IX or Title VII, 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
 - Remedy its effects

POLICY STATEMENT

Sexual Misconduct Policy

Non-Discrimination Statement

Federal Compliance

Gratz College fulfills its obligations under the Violence Against Women Reauthorization Act of 2013 (VAWA) amendments to the Clery Act in responding to reports of Prohibited Conduct.

Sanctions

Individuals found responsible for violating this Policy may face disciplinary action, up to and including:

- Expulsion (for students)
- Termination of employment or contractual relationship (for employees or third-party contractors)

Title IX Coordinator (Primary Contact for Reports and Inquiries)

Thomas R. Cipriano, Jr.

Acting Title IX Coordinator

tcipriano@gratz.edu

215-635-7300 x 195

General Contact Email

titleix@gratz.edu

Office Location: Jenkintown Campus

www.gratz.edu/students/policies/title-ix

SCOPE OF POLICY

This Policy applies to all reports of Prohibited Conduct occurring on or after the effective date of this Policy.

- If the conduct occurred before the effective date, the definitions in place at the time of the incident will be used.
- If the conduct occurred before the effective date, the process in place at that time will apply until the revised process is adopted.
- Once the revised Policy is in effect, the grievance process under this Policy will be used to investigate and resolve all reports filed on or after the effective date, regardless of when the incident occurred.

Definitions of Parties

- Complainant: An individual alleged to be the victim of conduct that could constitute sexual harassment.
- Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.
- Third Party: Any other participant in the process, including a witness or an individual who makes a report on behalf of a Complainant.

Formal Complaint Process

The process begins with a Formal Complaint, which may be:

- Filed by a Complainant, or
- Signed by the Title IX Coordinator, alleging sexual misconduct against a Respondent and requesting a College investigation.

Anonymous complaints may also be submitted. However, the ability of the College to respond may be limited if the report does not include sufficient information.

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

Parental and Guardian Rights

Nothing in this Policy removes the legal right of a parent or guardian to act on behalf of a Complainant, Respondent, or Third Party, including the right to file a Formal Complaint.

SCOPE OF POLICY

Administrative and Legal Processes

- Possible violations of the Sexual Misconduct Policy are addressed through an administrative process at the College.
- A Complainant may also pursue criminal or civil legal recourse at the same time.
- These processes are independent—one is not dependent upon the other.

Compliance Note

This section aligns with U.S. Department of Education Title IX regulations under:

- 34 CFR §106.30 – Definitions of “Complainant,” “Respondent,” and “Formal Complaint”
- 34 CFR §106.44 – Recipient’s general response to sexual harassment
- 34 CFR §106.45–46 – Grievance process for formal complaints

COVERAGE OF POLICY

Persons Covered by the Policy

This Policy applies to all members of the Gratz College community, including:

- Students
- Faculty
- Administrators and staff
- Volunteers
- Vendors and contractors
- Visitors
- Individuals regularly or temporarily employed, conducting business, studying, visiting, or otherwise engaged in official activities with the College or on College property

The Title IX process applies when either one or both parties involved are students or employees.

Gratz 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 also provide supportive measures, with or without a Formal Complaint.

Locations Covered by the Policy

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

- **On-Campus Conduct**

- Applies to conduct on property owned, controlled, leased, or managed by Gratz College.
- College Programs
- Applies to conduct in the context of College employment, academic programs, or activities, including internships and College-sponsored events.

- **Off-Campus Conduct**

- Applies to conduct at College-sponsored activities or other locations when the conduct:
 - Adversely affects the College community, and/or
 - Undermines the pursuit of the College's mission and objectives.

COVERAGE OF POLICY

The Dean of the College has discretion, on a case-by-case basis, to determine whether campus disciplinary proceedings should be initiated for conduct occurring off campus.

Quick Reference Box: What's Covered?

Covered by Policy

- Student harassed at a College-sponsored event (on or off campus)
- Employee sexually harassed by a supervisor in the workplace
- Misconduct during an academic internship program
- Violence at a College-hosted conference at a hotel venue
- Contractor harassing a student on College property

Not Covered by Policy (unless College mission is impacted)

- Two students in an off-campus apartment dispute unrelated to College programs
- Private disputes between community members occurring outside of College programs or activities
- Incidents entirely unconnected to the College, its property, or its programs

Compliance Note

This section aligns with U.S. Department of Education Title IX regulations, specifically:

- 34 CFR §106.44(a) – Response to sexual harassment in education programs or activities
- 34 CFR §106.45(b)(10) – Discretion for off-campus conduct when substantial effects exist
- DOE guidance clarifying that supportive measures must be available regardless of whether a Formal Complaint is filed

DEFINITIONS

Prohibited Conduct & Related Terms

Sexual Harassment

Conduct on the basis of sex that includes one or more of the following:

1. **Quid Pro Quo Harassment** – An employee of the College conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct.
2. **Hostile Environment Harassment** – Unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal access to the College's education program or activity.
3. **Other Sexual Misconduct** – Sexual Assault, Dating Violence, Domestic Violence, or Stalking (defined below).
- 4.

Examples of Sexual Harassment:

- Unwanted sexual advances or comments
- Inappropriate or unwelcome touching
- Threats of punitive academic or job actions for refusing advances
- **Subtle harassment:** sexually oriented emails/voicemails, sexual jokes, repeated unwanted invitations, display of explicit posters/objects, or indirect innuendo such as suggestive tone or staring at body parts.

Gender-Based Harassment

Harassment based on sex, gender identity, or gender expression, which may include aggression, intimidation, or hostility, whether verbal, physical, graphic, or otherwise.

Factors considered in determining hostile environment:

- Frequency and severity of conduct
- Whether it was threatening
- Impact on emotional state or academic/work performance
- Whether directed at multiple people
- Context of other discrimination
- Whether academic freedom or protected speech applies

A single severe incident (*especially physical*) may create a hostile environment.

DEFINITIONS

Sexual Assault

As defined in 20 U.S.C. §1092(f)(6)(A)(v) and FBI Uniform Crime Reporting standards:

- **Rape:** Penetration (however slight) of the vagina or anus with body part/object, or oral penetration by a sex organ without consent.
- **Fondling:** Touching of private body parts for sexual gratification without consent.
- **Incest:** Sexual intercourse between persons prohibited by law to marry.
- **Statutory Rape:** Sexual intercourse with a person under the statutory age of consent.

Domestic Violence

Felony or misdemeanor crimes of violence committed by:

- A current/former spouse or intimate partner,
- Someone with whom the victim shares a child,
- Someone cohabitating (or who has cohabitated) with the victim as a spouse/partner,
- A person similarly situated to a spouse, or
- Any person against an adult or youth protected under domestic/family violence laws.
- (34 U.S.C. §12291(a)(8))

Dating Violence

Violence committed by a person who is or has been in a romantic/intimate relationship with the victim, determined by:

- Length of relationship,
- Type of relationship,
- Frequency of interaction.
- (34 U.S.C. §12291(a)(10))

Stalking

A course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for their safety or the safety of others; or
2. Suffer substantial emotional distress.
3. (34 U.S.C. §12291(a)(30))

Retaliation

No person may intimidate, threaten, coerce, or discriminate against anyone:

- For reporting Prohibited Conduct,
- For participating (or refusing to participate) in any Title IX proceeding.

Retaliation includes threats, intimidation, and discrimination — but does not include disciplinary action for knowingly making false statements in bad faith.

DEFINITIONS

Consent

Consent means agreement to engage in sexual activity that is knowing, voluntary, and mutual, expressed through words or actions.

Consent is invalid if:

- Obtained by force, coercion, or intimidation,
- The individual is a minor, mentally impaired, asleep, unconscious, or incapacitated by drugs/alcohol.

Key Points:

- Silence $\neq$ Consent
- Consent can be withdrawn at any time
- Past consent $\neq$ future consent
- Intoxication is not a defense to failing to obtain consent

Force & Coercion

- Force: Use or threat of violence to overcome a person's will.
- Coercion: Improper pressure (threats, blackmail, manipulation, repeated pressure) that impairs free will.

Incapacitation

A state in which an individual cannot make an informed decision due to unconsciousness, sleep, intoxication, or a physical/mental condition.

- Alcohol/drug use alone does not equal incapacitation — effects must be evaluated (decision-making, awareness, judgment, appreciation of the act).
- A “reasonable person” standard is applied to determine whether the Respondent knew or should have known of incapacitation.

Privacy & Confidentiality

- Privacy: Information is shared only with those who need to know.
- Confidentiality: Information shared with legally protected professionals (e.g., counselors, clergy) is not disclosed without permission.

DEFINITIONS

Roles Defined

- **Advisor:** Person chosen by Complainant/Respondent to assist in the Title IX process (may be attorney).
- **Official with Authority:** A College official empowered to implement corrective measures (e.g., Title IX Coordinator, Deputy).
- **Responsible Employee:** Any employee required to report sexual harassment or misconduct to the Title IX Coordinator.
- **Complainant:** Individual alleged to be the victim of sexual harassment.
- **Respondent:** Individual reported to be the perpetrator.
- **Third Party:** Any other participant (witness or reporter).
- **Formal Complaint:** A signed document alleging sexual harassment and requesting an investigation.

Immunity for Victims

To encourage reporting, victims (and those assisting them) will not face disciplinary action for minor policy violations (e.g., underage drinking at the time of assault) when reporting incidents in good faith. Discretion rests with the Dean of the College or designee.

Quick Reference Box – Prohibited Conduct

Covered by Policy

- Student harassed via repeated unwanted texts
- Dating violence between two students in a relationship
- Sexual assault at a College-sponsored event
- Stalking by an ex-partner that interferes with academics
- Retaliation against a staff member who reported harassment

Not Covered (unless College's mission is impacted)

- Consensual arguments unrelated to sex/gender
- Protected speech in classroom discussions that is not severe/pervasive
- Personal disputes completely unrelated to College programs

Compliance Note

This section aligns with:

- **34 CFR §106.30** – Definitions of sexual harassment, complainant, respondent, formal complaint
- **34 CFR §106.44–46** – Response, grievance process, and retaliation protections
- **20 U.S.C. §1092(f)(6)** – Clery Act definitions of sexual assault
- **34 U.S.C. §12291** – Federal definitions of domestic violence, dating violence, and stalking
- DOE/VAWA guidance on consent, incapacitation, and retaliation

REPORTING & RESOURCES

Reporting an Incident

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

Campus Security

215-635-7310

campussecurity@gratz.edu

Title IX Coordinator

Thomas Cipriano (Acting Coordinator)

215-635-730

tcipriano@gratz.edu

General Title IX Contact

titleix@gratz.edu

www.gratz.edu/students/policies/title-ix

Office located at Jenkintown Campus

Local Law Enforcement

Cheltenham Police Department (*Mandell Campus*)

215-885-1600 or dial 911

Lower Merion Township Police Department (*Bala Campus*)

610-649-1000 or dial 911

Jenkintown Borough Police Department (*Jenkintown Campus*)

Chief Thomas M. Scott

215-884-1202 (office) or dial 911

tscott@jenkintownpd.org



Quick Reference Box: When to Call

✓ Contact Campus Security or Title IX

- Sexual harassment, assault, or discrimination
- Dating or domestic violence
- Stalking or threatening behavior
- Retaliation concerns

✓ Contact Local Police / 911

- Immediate danger to self or others
- Ongoing violence or threats
- Emergency requiring law enforcement response

REPORTING & RESOURCES

On-Campus Reporting Options

Gratz College strongly encourages all individuals to report any violation of this Policy to the Title IX Coordinator or any Official with Authority.

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

- Ensuring Title IX compliance
- Assessing intake reports
- Assigning investigators
- Tracking incidents of sexual misconduct
- Coordinating education and prevention efforts
- Providing resources and resolution options

Law Enforcement Reporting Options (On and Off Campus)

- Complainants have the right to notify or decline to notify law enforcement.
- The College strongly encourages immediate reporting to preserve evidence and support a timely response.
- The College will assist community members by:
 - Securing safe locations
 - Arranging transportation to hospitals
 - Coordinating with police
 - Providing information about on- and off-campus resources

Supportive Measures

Supportive Measures are non-disciplinary, non-punitive services available to both Complainants and Respondents, with or without a Formal Complaint.

For Students

- Academic support (tutoring, extensions, schedule changes)
- Changes to housing or class schedules
- Mutual no-contact directives
- Referrals to off-campus services

For Employees

- Modified work schedules or locations
- Mutual no-contact directives
- Administrative leave if appropriate
- Enhanced security or monitoring

REPORTING & RESOURCES

Key Notes

- Supportive measures are designed to preserve equal access to education and ensure safety.
- Requests for No-Contact Orders or similar protections will be reviewed promptly.
- Privacy will be respected to the fullest extent practicable.
- Violations of supportive measures will result in immediate action.

Emergency Removal

The College may remove a Respondent from campus on an emergency basis if:

- An individualized safety/risk analysis determines an immediate threat exists, and
- The Respondent is given notice and the opportunity to challenge the decision.

This does not override rights under the IDEA, Section 504 of the Rehabilitation Act, or the ADA.

Administrative Leave

The College may place a non-student employee Respondent on administrative leave during an investigation, consistent with Section 504 and the ADA.

Educational Programming and Prevention

Gratz College provides educational programs on:

- Sexual misconduct prevention
- Awareness of sexual assault, stalking, dating violence, and domestic violence
- Title IX rights and reporting

Support Networks and Contacts

Resources are available to assist survivors:

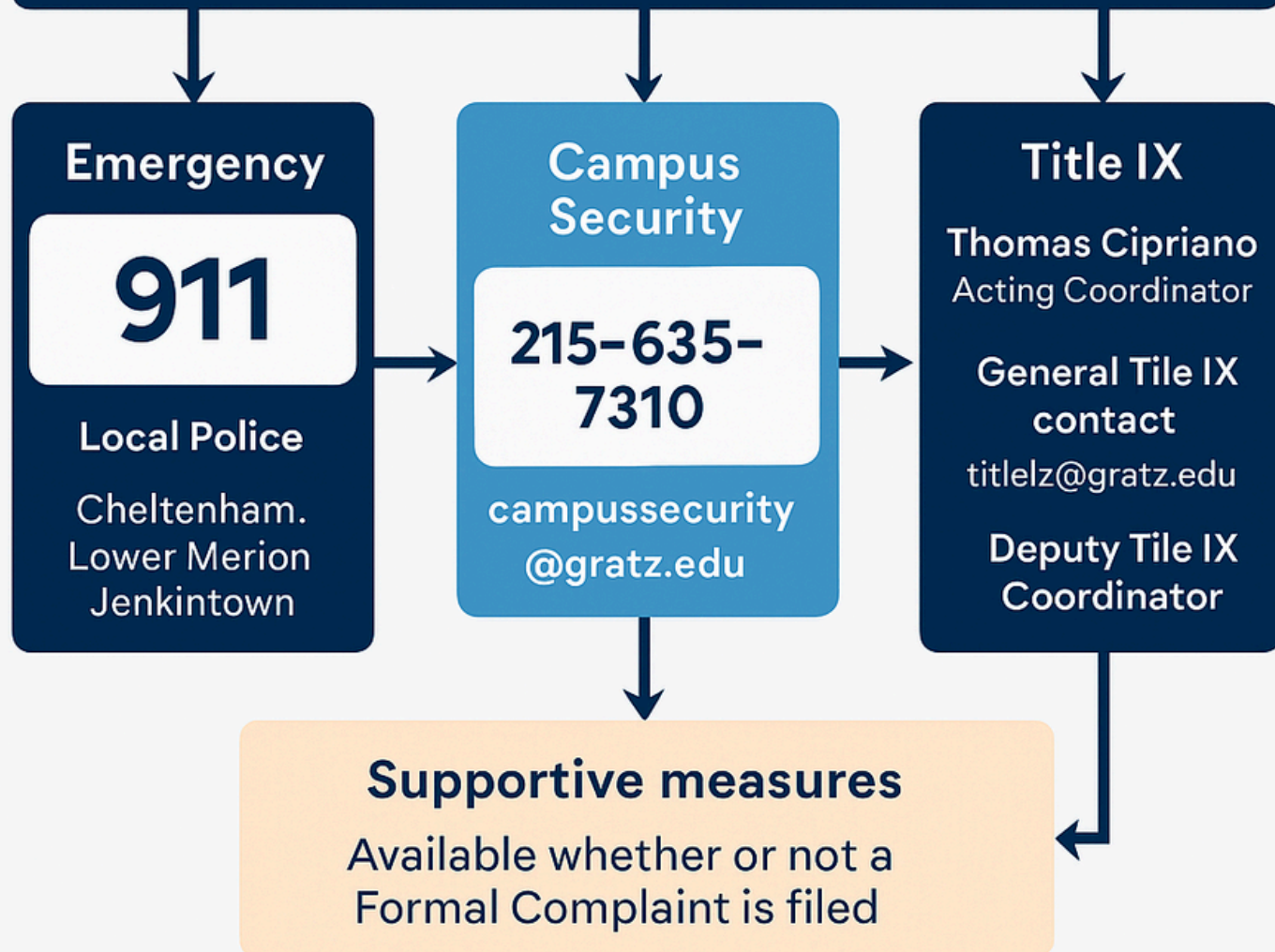
- **Cheltenham Police Department** – 215-885-1600 or 911
- **Philadelphia Police Special Victims Unit** – 215-685-3251 or 911
- **Philadelphia Domestic Violence Hotline** – 1-866-723-3014
- **WOAR (Women Organized Against Rape)** – 215-985-3333

Sex Offender Registry

Under the Campus Sex Crimes Prevention Act, registered sex offender information is available at:

- **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

REPORTING OPTIONS AND SUPPORT RESOURCES



GRATZ
COLLEGE

Compliance Note

This section fulfills:

- Clery Act (34 CFR §668.46(b)(2)) – reporting procedures and contact requirements
- Title IX (34 CFR §106.8, §106.44) – reporting options, supportive measures, emergency removal, administrative leave
- VAWA amendments (34 U.S.C. §12291) – definitions and victim services requirements
- Campus Sex Crimes Prevention Act (20 U.S.C. §1092(f)(1)(I)) – sex offender registry disclosures

GRIEVANCE PROCEDURES

Grievance Procedures for Resolving Allegations of Sexual Misconduct

General Information

These procedures outline how Gratz College (“the College”) resolves allegations that a Respondent violated the Sexual Misconduct Policy. The Complainant and Respondent are referred to collectively as the Parties.

This is an administrative process.

- Matters in which both Parties are employees may proceed under Title IX or the Nondiscrimination Policy/Title VII, depending on the alleged Prohibited Conduct.
- The Office of Title IX (Title IX Coordinator and team) coordinates the resolution of all reports of Prohibited Conduct as defined in the Sexual Misconduct Policy.
- Conduct based on protected status other than sex (e.g., race, color, age, disability, veteran status) is addressed under the Nondiscrimination Policy. The College will route such reports to the appropriate office.

Dismissal of a Formal Complaint

The College must dismiss a Formal Complaint for Title IX purposes if, even if proven, the alleged conduct:

- Would not constitute Title IX sexual harassment; or
- Did not occur in the College’s education program or activity; or
- Did not occur in the United States.

Such dismissal does not preclude action under other College policies (e.g., Student Code of Conduct, Personnel Practices Code).

The College may dismiss a Formal Complaint (or any allegation) if at any time:

1. The Complainant requests in writing to withdraw the complaint/allegations;
2. The Respondent is no longer enrolled or employed; or
3. Specific circumstances prevent the College from gathering sufficient evidence.

Upon any dismissal (mandatory or discretionary), the College will promptly notify both Parties in writing (simultaneously) with the reasons for dismissal and appeal rights.

GRIEVANCE PROCEDURES

Grievance Procedures for Resolving Allegations of Sexual Misconduct

Consolidation of Formal Complaints

The College may consolidate Formal Complaints when allegations arise from the same facts or circumstances, including:

- Multiple Respondents;
- Multiple Complainants against one or more Respondents; or
- Cross-complaints between Parties.

Rights of Complainant and Respondent

- Right to be informed of the process and options
- Right to information about resources
- Right to Supportive Measures
- Right to a timely investigation
- Right to an Advisor of choice
- Right to review the investigative report
- Right to appeal (see Appeals)

Advisors

Both Parties may select any Advisor (including an attorney). Parties—not the College—are responsible for keeping their Advisors informed.

Advisor roles:

- May attend meetings/hearings with the Party;
- May not speak on the Party's behalf in meetings (except at live hearings for cross-examination);
- May confer with the Party quietly or in writing;
- If a Party lacks an Advisor at the Live Hearing, the College will provide one at no cost for the limited purpose of cross-examination.

At the Live Hearing, each Party's Advisor may ask the other Party/witnesses all relevant questions and follow-ups, including credibility challenges, subject to the decision-maker's relevance determinations.

GRIEVANCE PROCEDURES

Step-by-Step Process

Step 0: Actual Knowledge

The Title IX process begins when the Title IX Coordinator or an Official with Authority receives Actual Knowledge (notice of sexual harassment or allegations). Actual Knowledge may include a Formal Complaint.

Step 1: Intake with Complainant

The Title IX Coordinator promptly contacts the Complainant to:

- Address immediate safety and well-being;
- Discuss Supportive Measures (available with or without a Formal Complaint) and consider the Complainant's wishes;
- Explain reporting options (confidential/non-confidential, law enforcement, medical care, evidence preservation) and assistance in contacting police;
- Provide information on on/off-campus resources (counseling, health, advocacy);
- Outline Informal Resolution vs. Formal Resolution processes and notice requirements;
- Explain additions of new allegations will trigger updated written notice;
- Remind of policies prohibiting false statements and retaliation;
- Explain rights to object for bias/conflict (Coordinator/Deputy/Investigators) within 1 Business Day of proceeding;
- Confirm the presumption of non-responsibility until a determination is made;
- Explain appeal rights for any dismissal.
-

Threshold determinations (communicated in writing):

1. If true, could the reported facts violate the Sexual Misconduct Policy?
2. If yes, is Informal Resolution appropriate?

If the Complainant requests confidentiality or no action, the Coordinator will weigh that request against campus safety and fairness obligations and determine next steps.

Step 2: Notice & Initial Interview with Respondent

After written notice of allegations (including names, nature of report, alleged policy violations, date/time/location, and a summary), the Coordinator/Deputy or Investigator meets with the Respondent to:

- Address safety/well-being;
- Discuss Supportive Measures;
- Explain police/medical options and evidence preservation;
- Provide resources;
- Outline Informal/Formal Resolution and notice procedures;
- Explain additions of new allegations will trigger updated written notice;
- Remind of false statement and retaliation prohibitions;
- Explain right to object for bias/conflict within 1 Business Day;
- Confirm presumption of non-responsibility;
- Explain appeal rights if a dismissal occurs.

GRIEVANCE PROCEDURES

Step 3: Determining the Resolution Path

- Informal Resolution (only after a Formal Complaint is filed and if appropriate—not permitted where an employee is alleged to have sexually harassed a student):
 - Requires the voluntary, written consent of both Parties after written notice of allegations and process terms, including any limits on resuming Formal Resolution.
 - Any Party (or the Coordinator) may terminate Informal Resolution until it becomes binding.
 - After notification of an agreement, either Party has 2 Business Days to rescind in writing; otherwise, the resolution becomes final.
- Formal Resolution (requires a Formal Complaint):
- The Coordinator notifies both Parties in writing and includes the following for the Respondent:
 - a. Complainant's name; 2) Nature of report; 3) Specific policy violations; 4) Date; 5) Time; 6) Location; 7) Brief description.

Step 4: Investigation

- Conducted promptly, fairly, and impartially by trained internal or external Investigators selected to avoid bias/conflict.
- Parties receive written notice of the Investigators and have 2 Business Days to object for bias/conflict.
- The College bears the burden of gathering evidence (inculpatory and exculpatory).
- Investigators interview Parties and witnesses, collect documents/media, and prepare Interview Summaries for review/correction.
- The College will not access/use privileged treatment records without a Party's voluntary, written consent.

Evidence Phase (Fact-Gathering & Rebuttal)

- Initial Fact-Gathering followed by Rebuttal rounds as needed to ensure completeness.

Preliminary Report

- Summarizes all directly related evidence (including evidence on which the College does not intend to rely).
- Uses Preponderance of the Evidence for factual findings but does not decide policy violation.
- Shared with Parties/Advisors for 10 Business Days to review and submit written responses and/or requests for additional investigation.
-

Addendum (if needed)

- Investigators conduct additional steps approved by the Coordinator and issue an Addendum.

GRIEVANCE PROCEDURES

Step 5: Final Investigative Report

- Includes the preliminary record, any addenda, and the Parties' responses.
- Provided to Parties/Advisors at least 10 Business Days before a hearing or determination.
- Coordinator meets individually with Parties (after the 10-day period) to discuss options; if both agree, the Coordinator may facilitate Informal Resolution (with the same 2-day rescission window).
- If either Party declines Informal Resolution, the Coordinator schedules a Live Hearing no sooner than 10 Business Days after the scheduling meeting.

Step 6: Live Hearing

1. Administrative hearing with neutral decision-maker(s) (internal or external).
2. Parties may appear in person or virtually (with real-time audio/visual).
3. The College creates an audio/audiovisual recording or transcript available for inspection/review.
4. Standard of Evidence: Preponderance of the Evidence.
5. Cross-Examination:
 - Conducted directly, orally, and in real time only by Advisors; Parties may not personally cross-examine.
 - Decision-maker(s) determine relevance before answers.
 - Questions about a Complainant's prior sexual behavior are not relevant unless to prove someone else committed the conduct or to prove consent regarding prior conduct with the Respondent.
 - If a Party has no Advisor, the College provides one at no cost for cross-examination.
6. Outcome Letter (to both Parties) includes:
 - Allegations; procedural steps; findings of fact; policy application; responsibility determinations; sanctions (if any); remedies for Complainant (if any); and appeal procedures.

Model Order of Hearing (streamlined)

1. Introductions & decorum; 2) Investigator presents Final Report + questions;
2. Complainant case (statement; panel questions; cross by Respondent's Advisor; witnesses);
3. Respondent case (statement; panel questions; cross by Complainant's Advisor; witnesses);
4. Closings (Complainant then Respondent); panel's final questions; adjournment;
5. Panel deliberation (private); 7) Determination to Coordinator within 3 Business Days.

Step 7: Appeals

Either Party may appeal in writing within 5 Business Days of the decision based on:

1. New evidence not reasonably available earlier that could affect the outcome;
2. Procedural irregularity that affected the outcome;
3. Bias or conflict of interest of the Coordinator, Investigator(s), or Decision-maker(s) that affected the outcome.

GRIEVANCE PROCEDURES

An Appeals Officer reviews the record and decides:

- If substantiated, return to the Coordinator for next steps;
- If not, the hearing decision stands.
- The Appeals Officer's decision is final.

Sanctions (Non-Exhaustive)

- Expulsion (permanent separation; barred from campus)
- Disciplinary Suspension (time-limited separation; may include campus ban)
- Limited Suspension (loss of specified privileges—e.g., class attendance, internships, facilities)
- Disciplinary Probation (with possible restrictions)
- Reprimand (oral or written)
- Counseling requirements (verification of participation only)
- Work assignment changes
- Referral to Human Resources for employment action

Record Keeping

The College maintains records for 7 years (per §106.45(b)(10)) and in accordance with the Records Retention Policy, includes:

- Investigations, determinations, recordings/transcripts, sanctions, remedies, appeals, informal resolutions, and training materials.

Examination and Revision

Policies are reviewed regularly and may be revised at any time to comply with current guidance, regulations, and laws.

Compliance Note

This section aligns with U.S. Department of Education Title IX regulations:

- **34 CFR §106.30** – Definitions (Actual Knowledge, Formal Complaint, etc.)
- **34 CFR §106.44** – Institutional response to sexual harassment (supportive measures, emergency removal)
- **34 CFR §106.45** – Grievance process (notice, investigation, evidence review, hearing, Advisors/cross-examination, standard of evidence, written determination, appeals, recordkeeping)
- **34 CFR §106.8** – Publication of Title IX Coordinator contact information and procedures
- **VAWA/Clery** cross-references for definitions and victim services

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**

ALL EMERGENCIES

**Police Department:
911**

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)**

TIMELY WARNINGS

Purpose. A timely warning notifies the Gratz College community about certain reported crimes and provides information to help community members protect themselves from similar incidents. Timely warnings address the Clery Act crime categories reported for Clery geography.

When Gratz Issues a Timely Warning

A timely warning will be considered/issued when all of the following are met:

1. A Clery Act crime is reported to a Campus Security Authority (CSA) or local law enforcement;
2. The incident is determined to pose a serious or continuing threat to students or employees; and
3. The incident occurred within Clery geography (on campus; on or in non-campus buildings or property that Gratz owns or controls, including those of officially recognized student organizations; or on public property within or immediately adjacent to campus).

Timely warnings can be issued for threats to persons or property. The victim or alleged offender does not need to be a member of the Gratz community.

Typical Clery crime categories include (non-exhaustive): criminal homicide, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, arson; hate crimes (by bias category); and VAWA offenses (dating violence, domestic violence, stalking).

Decision & Timing

- Determinations are made promptly by the Director of Campus Security (or designee), often in consultation with local law enforcement and relevant College offices (e.g., Title IX).
- The warning is issued as soon as pertinent information is available, balancing community safety with the integrity of any ongoing investigation.

Content of a Timely Warning

Each warning will generally include, as appropriate and available:

- Nature of the incident and the date/time it occurred or was reported;
- Location (general area) and relevant suspect information if doing so will aid safety;
- Safety tips / risk-reduction steps;
- How to report additional information and available resources.

Personally identifying information of victims will not be included. Information may be limited if release would compromise an investigation, jeopardize safety, or reveal a victim's identity.

TIMELY WARNINGS

How Timely Warnings Are Distributed

Timely warnings are distributed via the College's Emergency Alert System and may use a combination of channels, such as:

- Email to students, faculty, and staff
- SMS/text and/or voice alerts (if enrolled)
- Website postings and/or campus portal
- Physical postings in key locations (as needed)

Timely warnings are pushed to the community and are not posted only in a place that requires people to search for them.

How to Report Information for a Possible Timely Warning

Anyone with information that may warrant a timely warning should contact Campus Security:

- 215-635-7310
- campussecurity@gratz.edu

or report directly to a CSA or local law enforcement (dial 911 for emergencies).

Quick Reference Box: Timely Warning vs. Emergency Notification

- **Timely Warning** → For certain Clery crimes posing a serious/continuing threat; issued as information develops.
- **Emergency Notification** → For significant emergency or dangerous situation (any threat to health/safety, on campus); issued immediately upon confirmation.

Compliance Note

This section aligns with Clery Act regulations at 34 CFR §668.46(e) (timely warnings), including:

- Applicable crime categories and Clery geography;
- Serious or continuing threat determination;
- Prompt issuance and appropriate content;
- Distribution methods that reach the campus community without requiring them to seek out the notice.

TIMELY WARNINGS



Crimes That Trigger Timely Warnings

- **Homicide**
- **Sexual Assault** (*Rape, Fondling, Incest, Statutory Rape*)
- **Robbery**
- **Aggravated Assault**
- **Burglary**
- **Motor Vehicle Theft**
- **Arson**
- **Hate Crimes**

EMERGENCY ALERT SYSTEM

Gratz College uses Everbridge to deliver emergency notifications to students, parents, faculty, and staff. Community members may register email addresses, cell phone numbers (with text messaging enabled), and other devices to receive alerts.

When Alerts Are Used:

- Immediate or urgent situations (e.g., emergencies, severe weather).
- Timely warnings under the Clery Act when required.
- Occasional system tests (announced in advance via Gratz email).

How Alerts Are Delivered:

- Email and/or text messages through Everbridge.
- Instructions may also be posted on the Gratz College website, distributed by Gratz email, included in the main phone system message, and broadcast on local radio and television.

Privacy & FERPA Compliance:

- FERPA allows release of information without consent when needed to protect health and safety.
- Records from campus law enforcement may be used for timely warnings without violating FERPA.

Off-Campus Crimes:

Gratz is not required to issue timely warnings for off-campus Clery crimes except for those on public property or in non-campus buildings owned or controlled by the College. However, the College may voluntarily issue warnings if:

- The crime involves murder, rape, or another serious violent assault;
- The local municipality requests a warning; or
- The crime occurred in an area frequented by Gratz students and represents a continuing threat.

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

BUILDING SECURITY AND ACCESS POLICY

Building Access

Gratz College's regular business hours are:

- **Monday–Thursday:** 9:00 a.m. – 5:30 p.m.
- **Friday:** 9:00 a.m. – 3:00 p.m.

Hours may vary due to holidays, events, classes, or unforeseen circumstances.

- **During business hours:** The building is open to students, parents, employees, contractors, guests, and invitees.
- **After hours:** Access is restricted to those with key/security code authorization or prior written approval.
- **Emergency closures:** Admittance to a closed building is permitted only by an authorized employee.

Security Systems

The Academic Building is protected by three alarm systems:

1. **Silent Alarm (Panic Buttons):** Located at fixed points, directly connected to Cheltenham Police Department. Intended for emergencies only; response is immediate and armed.
2. **Security Alarm:** Activated by motion detectors, breaches, or manual trigger. Produces audible and visual alerts; notifies both the contracted security company and Cheltenham Police.
3. **Fire Alarm:** Activated by smoke detection. Produces audible and visual alerts; automatically notifies Cheltenham Fire Department.

⚠ Emergency exits must remain closed at all times unless in active emergency use.

Procedures for Building Access

- **Opening:** Authorized employees disarm alarms, inspect premises, and remain at the front desk until reception staff arrive.

BUILDING SECURITY AND ACCESS POLICY

Building Access

- **During Business Hours:**
 - Visitors without an access ID badge must confirm their reason for visit via intercom.
 - All visitors, contractors, and invitees must:
 - Sign in at the front desk.
 - Present identification.
 - Wear a visitor's pass visibly at all times.
 - Visitors may only access areas once their host is notified.
 - Upon departure, visitors must sign out and return the pass.
- **Closing:** Maintenance staff check and secure all areas, confirm building is vacated, lock doors, activate alarms, and depart with front desk personnel.

Off-Campus Student Organizations

Gratz College does not recognize off-campus student organizations. College-sponsored off-campus activities are supervised by staff, who will coordinate with local law enforcement if incidents occur. Supervisors must also notify the Manager of Business Operations and Facilities. Gratz personnel do not have authority to respond directly to off-campus incidents.

Building Maintenance

The Gratz Maintenance Department, in partnership with the Jewish Federation of Greater Philadelphia, maintains building and grounds with a focus on safety and security.

- Report hazards (e.g., broken windows, unsafe conditions) to:
 - Maintenance Department: (215) 635-7300, ext. 195
 - Reception Desk: ext. 100

Weapons on Campus

Weapons are strictly prohibited for all students, faculty, staff, and visitors. Only trained and licensed security professionals hired for specific events or responses may carry weapons.



DRUG AND ALCOHOL ABUSE PREVENTION

Addiction is a treatable, chronic medical condition involving complex interactions among brain circuits, genetics, the environment, and personal experiences. People with addiction may use substances or engage in behaviors compulsively, despite harmful consequences. Prevention efforts and treatment approaches for addiction are generally as effective as those for other chronic diseases.

(Source: American Society of Addiction Medicine, ASAM)

CAMPUS DRUG POLICY

Drug-Free Campus Policy

As a recipient of federal financial aid funding, Gratz College complies with the Drug-Free Schools and Communities Act Amendments of 1989 (34 CFR Part 86, Subpart B) and the Drug-Free Workplace Act. These laws, together with College policy, strictly prohibit:

- The unlawful manufacture, distribution, possession, or use of controlled substances;
- The misuse of intoxicating beverages;
- The unlawful sale or transfer of controlled/illegal drugs;
- Any drug- or alcohol-related misconduct on College property or during College-sponsored functions.

Applicability

This policy applies to all students, employees, contractors, and visitors on College property or at College-sponsored activities.

Enforcement and Sanctions

- **Students:** Violations may result in disciplinary action up to and including expulsion, as well as referral to law enforcement.
- **Employees:** Violations may result in disciplinary action up to and including termination of employment, and referral to law enforcement.
- **Criminal Penalties:** Violations may also result in prosecution under federal, state, or local law.

Gratz College reserves the right to inspect and search College property (including offices, desks, lockers, classrooms, break areas, etc.) at any time without prior notice.

Policy Purpose

Gratz College recognizes that the abuse of alcohol and use of illegal drugs are inconsistent with academic and professional success. The College seeks to:

- Establish and enforce clear policies to maintain a drug- and alcohol-free campus;
- Educate all members of the College community about the health risks of drug and alcohol abuse;
- Foster a safe and supportive environment that promotes responsible choices;
- Provide reasonable resources and referrals for individuals affected by alcohol or drug misuse.

CAMPUS ALCOHOL POLICY

Alcohol Beverage Campus Policy

Gratz College is committed to maintaining a safe and healthy learning environment. In compliance with the Drug-Free Schools and Communities Act (DFSCA) and Pennsylvania law, the possession, consumption, or distribution of alcoholic beverages is prohibited on College property and at College-sponsored events, unless expressly authorized by the College.

Permitted Exceptions

Alcohol may only be served at Gratz College-sanctioned events that meet the following conditions:

- **Approval:** Events must be pre-approved by the Events Coordinator's Office following confirmation from the Dean of the College.
- **Type of Alcohol:** Only beer and/or wine may be served. Cocktails, mixed drinks, kegs, vats, and other large-scale containers are prohibited.
- **Service Standards:** Alcohol must be served in compliance with Pennsylvania law—no service to individuals under 21 or visibly intoxicated. Alcohol may not leave the event venue.
- **Food & Non-Alcoholic Options:** Events must provide food and non-alcoholic beverages throughout the duration of alcohol service.
- **Bartenders:** Professional bartenders are required. Ratio: one bartender per 125 guests. Costs are the responsibility of the event organizer(s).
- **Responsible Contact:** Student events must have a designated faculty or staff member serving as the responsible contact to ensure compliance.

Prohibited Conduct

- Unauthorized possession or consumption of alcohol on College property.
- Alcohol purchased, distributed, or sold by students on campus.
- Failure to comply with approved event requirements.

Disciplinary Sanctions

- **Students:** Violations may result in disciplinary action up to and including suspension or expulsion, in addition to referral to law enforcement.
- **Employees:** Violations may result in disciplinary action up to and including termination of employment, and possible referral to law enforcement.



RESOURCES FOR CHEMICAL DEPENDENCY AND SUBSTANCE ABUSE

Gratz College is committed to supporting students, employees, and community members who may be struggling with alcohol or drug-related issues. Confidential help is available through the following national and workplace resources:

National Hotlines & Treatment Locators

- SAMHSA – Find Treatment: www.samhsa.gov | 1-800-662-HELP (4357)
- Free, confidential treatment referral and information service available 24/7.
- National Drug Helpline: 1-844-289-0879
- Private, confidential assistance from trusted professionals, day and night.
- American Addiction Centers: www.drugabuse.com | 1-888-744-0069
- 24/7 helpline, free of charge, no obligation to enter treatment.

Peer Support Networks

- Narcotics Anonymous (NA): www.na.org | 1-844-624-3575 (1-844-NAHELPLINE)
- Peer-led recovery groups available nationwide.

Workplace & Employee Support

- SAMHSA Drug-Free Workplace Helpline: 1-800-WORKPLACE (967-5752) | dwp@samhsa.hhs.gov
- Confidential, practical support for employees and families, covering workplace policies, drug-free programs, and drug testing.

Local & Campus Referrals

Students and employees may also request referrals through Gratz College Student Support Services or Campus Security:

- Campus Security: 215-635-7310 | campussecurity@gratz.edu

RESOURCES FOR ALCOHOL ABUSE

Gratz College encourages any student, employee, or community member struggling with alcohol misuse to seek support. Confidential resources are available both locally and nationally.

Peer Support and 12-Step Programs

- **Codependents Anonymous (CODA):** 1-888-444-2359 | www.coda.org
Promotes healthy relationships through a 12-step model. Provides information on local meetings.
- **Alcoholics Anonymous (AA):** 215-623-7900 (Philadelphia) | 856-486-4444 (South Jersey) | www.aa.org. Offers 12-step peer support meetings. Includes searchable meeting lists, times, and formats.
- **Adult Children of Alcoholics (ACOA):** 215-333-0444 | www.adultchildren.org. 12-step recovery program for individuals raised in alcoholic or dysfunctional homes.

Treatment and Counseling Services

- **SAMHSA – Find Treatment:** www.samhsa.gov | 1-800-662-HELP (4357) Free, confidential treatment locator available 24/7.
- **American Addiction Centers:** www.drugabuse.com | 1-888-744-0069
24/7 helpline, free of charge, with no obligation to enter treatment.

Educational and Prevention Resources

- **College Drinking: Changing the Culture:** www.collegedrinkingprevention.gov/parentsandstudents
- **College Binge Drinking Awareness:** www.collegebingedrinking.net
- **Rethinking Drinking (NIAAA):** www.rethinkingdrinking.niaaa.nih.gov

Local and Campus Referrals

- **Campus Security:** 215-635-7310 | campussecurity@gratz.edu

HAZING POLICY

In compliance with the Timothy J. Piazza Antihazing Law (Act 80 of 2018), Gratz College strictly prohibits hazing in all forms. Hazing is defined as any action or situation that recklessly or intentionally endangers the mental or physical health or safety of a student, regardless of consent, for the purpose of initiation, admission, or continued membership in any organization.

- Hazing is prohibited in all student organizations, clubs, athletic activities, and College-sponsored programs.
- Any violation will result in disciplinary action up to and including suspension, expulsion, or termination, as well as possible criminal prosecution under Pennsylvania law.
- Gratz College publishes a biennial hazing report on its website in compliance with Act 80, which includes all reported hazing incidents and outcomes.

✚ **Important Note:** Gratz College does not have fraternities, sororities, or student residential organizations, but is still subject to Pennsylvania law and maintains this policy to protect students in all College-sponsored activities.

CLERY GEOGRAPHY

Under the Clery Act, colleges and universities are required to disclose crime statistics that occur within specific geographic areas, known collectively as the institution's Clery Geography. These categories are defined as follows:

On Campus

- Any building or property owned or controlled by Gratz College within the main, reasonably contiguous campus area.
- Properties used directly to support the College's educational purposes (e.g., classrooms, offices, libraries).
- Properties owned by the College but controlled by another entity (e.g., food or retail vendor spaces) that are frequently used by students and serve institutional purposes.

On Campus in Residential Halls

- This category includes dormitories or other student residential facilities located on campus.
- Institutions must disclose both the total number of crimes on campus and a separate count for those occurring in residential facilities.
- Note: Gratz College does not operate any dormitories or student residential housing.

Non-Campus Property

- Any building or property owned or controlled by a student organization officially recognized by Gratz College.
- Any building or property owned or controlled by the College that is used for educational purposes, is frequently used by students, and is not part of the contiguous main campus.

Public Property

- All public property, including streets, sidewalks, parking lots, and thoroughfares, that is within or immediately adjacent to the campus and accessible to the College community.

CLERY ACT CRIMES

Crimes Against Persons

- **Murder / Non-Negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.
- **Manslaughter by Negligence:** The killing of another person through gross negligence.
- **Sexual Assault:** Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.
 - **Rape** – Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
 - **Fondling** – The touching of the private body parts of another person for the purpose of sexual gratification, without consent, including when the victim is incapable of giving consent due to age or incapacity.
 - **Incest** – Sexual intercourse between persons related within degrees wherein marriage is prohibited by law.
 - **Statutory Rape** – Sexual intercourse with a person under the statutory age of consent.
- **Dating Violence:** Violence committed by a person who is or has been in a romantic or intimate relationship with the victim.
- **Domestic Violence:** Violence committed by a current or former spouse or intimate partner, cohabitant, or other person protected under domestic or family violence laws.
- **Stalking:** A course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or suffer substantial emotional distress.

Property Crimes

- **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, violence, or by putting the victim in fear.
- **Burglary:** The unlawful entry of a structure to commit a felony or theft. For reporting purposes, this includes forcible entry, unlawful entry without force, and attempted forcible entry.
- **Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. This includes automobiles, trucks, motorcycles, and other vehicles that run on land, but not farm equipment or watercraft.
- **Arson:** Any willful or malicious burning or attempt to burn a dwelling, house, public building, motor vehicle, aircraft, or personal property of another.

CLERY ACT CRIMES

Crimes Against Persons

Hate Crimes

Any of the above crimes (murder, manslaughter, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, arson), or the following offenses, that evidence bias against a race, religion, sexual orientation, gender, gender identity, ethnicity, national origin, or disability:

- **Larceny-Theft** – The unlawful taking of property from another's possession.
- **Simple Assault** – Unlawful physical attack by one person upon another without a weapon or serious injury.
- **Intimidation** – Threatening another person with harm, placing them in reasonable fear of injury, without a weapon or physical attack.
- **Destruction/Damage/Vandalism of Property** – Willfully or maliciously destroying, damaging, defacing, or otherwise injuring property.

Arrests and Disciplinary Referrals

Institutions must also report statistics for arrests and referrals for disciplinary action for the following law violations:

- **Weapons Law Violations** – The violation of laws or ordinances dealing with weapon offenses, including carrying, possessing, furnishing, or using firearms, knives, explosives, or other deadly weapons.
- **Drug Abuse Violations** – The unlawful possession, sale, use, growing, manufacturing, or making of narcotic drugs, including opium, cocaine, marijuana, synthetic narcotics, and dangerous non-narcotic drugs.
- **Liquor Law Violations** – The violation of laws or ordinances prohibiting the manufacture, sale, transportation, furnishing, or possession of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating stills; furnishing liquor to a minor or intoxicated person; and possession of liquor by a minor. (Excludes driving under the influence and drunkenness.)

CLERY ACT CRIMES

VAWA Offenses

- **Domestic Violence** – A felony or misdemeanor crime of violence committed by:
 - A current or former spouse or intimate partner;
 - A person with whom the victim shares a child;
 - A person cohabitating, or who has cohabitated, with the victim as a spouse or intimate partner;
 - A person similarly situated under domestic or family violence laws.
- **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. Determination is based on the relationship's length, type, and frequency of interaction.
- **Stalking** – Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - Fear for their safety or the safety of others; or
 - Suffer substantial emotional distress.

Crimes Against Persons and Property

- **Robbery** – Taking or attempting to take anything of value from a person by force, threat of force, or by putting the victim in fear.
- **Burglary** – Unlawful entry of a structure to commit a felony or theft (includes forcible entry, unlawful entry without force, and attempted forcible entry).
- **Motor Vehicle Theft** – Theft or attempted theft of a self-propelled vehicle that runs on land but not rails (excludes boats, aircraft, and farm equipment).
- **Aggravated Assault** – Unlawful attack with intent to inflict severe or aggravated bodily injury, often involving a weapon or means likely to produce death or serious harm.
- **Arson** – Willful or malicious burning or attempt to burn a dwelling, public building, motor vehicle, aircraft, or personal property of another.

Fire Safety (HEA Requirement)

Gratz College does not maintain on-campus student housing facilities; however, for reference, the Higher Education Act requires reporting fire data in residential facilities.

- **Unintentional Fire** – A fire without intentional human action.
- **Intentional Fire** – A fire ignited deliberately under circumstances where a fire should not be present.
- **Undetermined Fire** – A fire where the cause cannot be determined.

CLERY ACT CRIMES

VAWA Offenses

Arrests and Disciplinary Referrals

- Weapons Law Violations – Violations of laws related to the manufacture, sale, possession, concealment, or furnishing of deadly weapons, including attempts.
- Drug Abuse Violations – Violations involving the unlawful possession, sale, use, growing, or manufacturing of narcotic drugs (includes opium, heroin, cocaine, marijuana, synthetic narcotics, dangerous non-narcotics).
- Liquor Law Violations – Violations of laws prohibiting the manufacture, sale, furnishing, possession, or transportation of alcoholic beverages, including possession by a minor.
(Excludes DUI and drunkenness.)

Hate Crimes

A Hate Crime is a criminal offense that shows evidence the victim was intentionally selected due to actual or perceived race, religion, sexual orientation, gender, gender identity, ethnicity, national origin, or disability.

In addition to Clery crimes listed above, the following offenses must be reported if motivated by bias:

- Larceny-Theft – Unlawful taking, carrying, or riding away of property from another's possession.
- Simple Assault – Unlawful physical attack without a weapon where the victim is not seriously injured.
- Intimidation – Placing another person in fear of bodily harm through threats, without a weapon or actual attack.
- Destruction/Damage/Vandalism of Property – Willful or malicious damage, defacement, or destruction of property without the owner's consent.

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

Sexual Orientation

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

Gender

Anti-Male
Anti-Female

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.

Disability

Anti-Mental Disability
Anti-Physical Disability

Gender Identity

Anti-Transgender
Anti-Gender Non-Conforming

Quick Reference: Reported Incidents Summary (2022–2024)

Category	2022	2023	2024
Criminal Offenses (Total)	0	0	0
Hate Crimes (Total)	0	0	0
VAWA Offenses (Total)	0	0	0
Arrests (Total)	0	1	0
Disciplinary Actions (Total)	0	0	0
Unfounded Crimes (Total)	0	0	0

2025 Annual Security Report - Statistical Tables

Criminal Offenses - On Campus

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Manslaughter by Negligence	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0

Criminal Offenses - Noncampus

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Manslaughter by Negligence	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0

Criminal Offenses - Public Property

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Manslaughter by Negligence	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0

VAWA Offenses - On Campus

Crime	2022	2023	2024
a. Domestic Violence	0	0	0
b. Dating Violence	0	0	0
c. Stalking	0	0	0

VAWA Offenses - Noncampus

Crime	2022	2023	2024
a. Domestic Violence	0	0	0
b. Dating Violence	0	0	0
c. Stalking	0	0	0

VAWA Offenses - Public Property

Crime	2022	2023	2024
a. Domestic Violence	0	0	0
b. Dating Violence	0	0	0
c. Stalking	0	0	0

Arrests - On Campus

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	0	0
c. Liquor Law Violations	0	0	0

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

Arrests - Noncampus

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	0	0
c. Liquor Law Violations	0	0	0

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

Arrests - Public Property

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	1	0
c. Liquor Law Violations	0	0	0

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

Disciplinary Actions - On Campus

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	0	0
c. Liquor Law Violations	0	0	0

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

Disciplinary Actions - Noncampus

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	0	0
c. Liquor Law Violations	0	0	0

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

Disciplinary Actions - Public Property

Crime	2022	2023	2024
a. Weapons: Carrying, Possessing, etc.	0	0	0
b. Drug Abuse Violations	0	0	0
c. Liquor Law Violations	0	0	0

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

Unfounded Crimes

Number	2022	2023	2024
a. Total Unfounded Crimes	0	0	0

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

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

APPENDIX

References & Resources

Acronyms & Abbreviations

- Clery Act – Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. § 1092(f))
- DFSCA – Drug-Free Schools and Communities Act (34 CFR Part 86)
- FERPA – Family Educational Rights and Privacy Act
- HEA – Higher Education Act of 1965
- VAWA – Violence Against Women Reauthorization Act of 2013

Quick Definitions

- Clery Geography – On-Campus, Non-Campus, and Public Property areas for which Gratz College reports statistics.
- Timely Warning – Campus-wide notice of Clery crimes that pose an ongoing or serious threat.
- Emergency Notification – Immediate alert for significant emergencies or dangerous situations involving an immediate threat to health or safety.
- Supportive Measures – Non-disciplinary, non-punitive individualized services offered to complainants and respondents in Title IX cases.
- Retaliation – Adverse action against someone for reporting misconduct or participating in a grievance process.

Compliance & Oversight Contacts

- Campus Security: 215-635-7310 | campussecurity@gratz.edu
- Title IX Coordinator (Acting): Thomas Cipriano – 215-635-7300 x195 | tcipriano@gratz.edu
- General Title IX Contact: titleix@gratz.edu | www.gratz.edu/students/policies/title-ix
- Cheltenham Police Department (Mandell Campus): 215-885-1600 | or dial 911
- Lower Merion Township Police (Bala Campus): 610-649-1000 | or dial 911
- Jenkintown Borough Police (Jenkintown Campus): Chief Thomas M. Scott – 215-884-1202 | tscott@jenkintownpd.org | or dial 911

APPENDIX

References & Resources

External Hotlines & Resources

- National Sexual Assault Hotline (RAINN): 1-800-656-4673 | rainn.org
- National Domestic Violence Hotline: 1-800-799-SAFE (7233) | thehotline.org
- Suicide & Crisis Lifeline: Dial 988
- SAMHSA Treatment Services: 1-800-662-HELP (4357) | samhsa.gov
- Narcotics Anonymous: 1-844-624-3575 | na.org
- Alcoholics Anonymous (Philadelphia): 215-623-7900 | aa.org
- American Addiction Centers: 1-888-744-0069 | drugabuse.com

Policy Reference List

- Title IX Sexual Misconduct Policy
- Nondiscrimination & Equal Opportunity Policy
- Drug-Free Campus Policy (DFSCA Compliance)
- Alcohol Policy
- Hazing Policy (Piazza Antihazing Law Compliance)
- Campus Security & Access Policy

Document Revision & Ownership

This Annual Security Report was last revised: September 2025.

Responsibility for updates rests with:

- **Director of Campus Security**
- **Office of Title IX**