



## INTRODUCTION

The Health Technology & Training Institute is dedicated to providing a safe and secure environment for students, faculty, staff and visitors to our Center City, Philadelphia campus along the Avenue of the Arts. The Avenue of the Arts continues to evolve with significant residential development replacing office space, creating new sources for economic development and commercial growth. South Broad Street has been recognized by the American Planning Association as one of the “Great Places of America”. The Avenue’s renowned performance venues, luxury hotels and eateries, universities, and residences are just a few reasons why the Avenue was given this prestigious recognition.

Many individuals and departments are involved in campus safety and security. This information can help keep you and others safe at the Health Technology & Training Institute. At the Health Technology & Training Institute, we endeavor to provide accurate information to our community regarding the safety of our campus. In furtherance of these efforts, we make our policies, procedures, and statistics available electronically at <https://www.1199ctraining.org>

## THE ANNUAL SECURITY REPORT

The Health Technology & Training Institute, in compliance with The Jeanne Clery Disclosure of Campus Security Policy and

Campus Crime Statistics Act (Clery Act), as Amended by the Higher Education Opportunity Act and the Violence Against Women Act, and The College and HTTI Security Act of 1988, reports annually to its current and prospective students and employees. The annual security report (ASR) contains statistics for the previous three (3) years pertaining to reported crimes that have occurred on-campus, in certain non-campus buildings or property that is owned or controlled by the Health Technology & Training Institute and on public property within, or immediately

adjacent to and accessible from the campus. All institutions participating in Federal student financial aid programs are required to provide information to the public regarding campus safety and security policies and procedures. Statistics regarding crimes related to their campuses must also be reported. The definition set used for this format is according to the FBI Uniform Crime Reporting (UCR)/National Incident-Based Reporting System (NIBRS).

## ALCOHOL AND DRUG POLICY AND PREVENTION

The Health Technology & Training Institute strives to provide a safe, productive, healthy and supportive environment for students, faculty, staff, and guests. Recognizing that the abuse of alcohol and other drug use is a major societal concern and health problem, HTTI sets forth policies and conducts counseling and educational programs to guide community members in making knowledgeable choices which foster ethical, healthy, and responsible lifestyle behaviors.

The Health Technology & Training Institute also maintains policies regarding the possession, use, consumption, and sale of alcoholic

beverages on campus. These policies include enforcement of State alcohol control laws, including underage drinking and open containers, by the Public Safety Department and outline sanctions which may be levied through HTTI's Director for Residence Life and Community Standards for violations of these policies.

The Health Technology & Training Institute maintains policies regarding the possession, use, consumption, and sale of controlled

dangerous substances (drugs) on campus. These policies include enforcement of State and Federal controlled dangerous substance laws by the Public Safety Department and outline sanctions which may be levied through HTTI's conduct process for violations of these policies.



HTTI's alcohol and controlled substances policy is documented in the Student Handbook . At the start of each academic year, the Associate Vice President for Student Affairs informs all students of these policies and directs them to these resources via email.

#### **ALCOHOL & OTHER DRUGS POLICY**

All members of the Health Technology & Training Institute community are hereby notified of the primary components of the Substance Abuse Prevention Policy in compliance with the Drug-Free Schools and Community Act of 1989 and subsequent amendments.

##### **Local, State and Federal Laws**

A person in the Commonwealth of Pennsylvania who is under 21 years of age commits a summary offense if they attempt to purchase, consume, possess or transport alcohol. If convicted of this offense the minor's driver's license will be suspended for 90 days. There is a \$300 fine for a first offense and second offense will yield a fine up to \$500. The police must notify the parents of any individual under the age of 18 charged with violating this law. Any person who intentionally provides alcohol to a minor will be convicted of a misdemeanor of the third degree. There will be a \$1,000 fine for the first offense and a \$2,500 fine for subsequent offenses. Maximum penalties are \$2,500 in fines and one-year imprisonment.

#### **REPORTING OF CRIMES AND OTHER EMERGENCIES**

To report a crime, contact:

By Phone:

- Philadelphia Police dial 9-1-1 (all emergencies)
- HTTI Public Safety at 215-568-2220 (all emergencies) or 215-717-6404 (non-emergencies)
- Office of Student Affairs at 215-568.2220
- Philadelphia Police 6th District (non-emergencies) 215-686-3060
- Philadelphia Police 9th District (non-emergencies) 215-686-3090

In Person:

- Philadelphia Police 6th District at 235 North 11th Street
- Philadelphia Police 9th District at 401 North 21st Street

#### **CAMPUS SECURITY AUTHORITY (CSA)**

A Campus Security Authority (CSA) is an individual who is an official of the institution that has significant responsibility for student and campus activities, including but not limited to:

- Public Safety Officers (Allied Universal Security)
- Associate VP for Student Affairs
- Resident or Campus Life Staff
- Title IX Coordinator
- Faculty Advisors to Student Groups
- Academic Advisors
- Campus Conduct Staff
- Student Resident Assistants (RA) or Graduate Assistants (GA)
- Physicians and Health Educators
- Campus Medical Personnel
- Counselors including peer counselors

Employees have the option of reporting an incident to their supervisor. Faculty members may report an incident

to their Chief Academic Officer

Under the Clery Act, a crime is reported when a victim, witness, other third party or even the offender brings it to the attention of a CSA or local law enforcement personnel. It does not matter whether or not the individual(s) involved in the crime or reporting the crime are associated with the institution. If a CSA receives the crime information and believes it was provided in good faith, he or she should document it as a crime report and provide this report to the Office of Public Safety. In “good faith” means there is a reasonable basis for believing that the information is not simply rumor or hearsay. CSAs are not responsible for investigating crimes; their role is to report all incidents immediately, no matter how minor an incident may seem. All investigations and crime classifications are the responsibility of sworn law enforcement personnel, including, but not limited to the Philadelphia Police Department.

There are two classifications of individuals who, although they have significant responsibilities for student and campus activities, are not considered CSAs under the Clery Act. They are pastoral counselors and professional counselors. A pastoral counselor is defined as a person who is associated with a religious order or denomination, is recognized by that religious order or denomination as someone who provides confidential

#### PROMPT CRIME REPORTING

Under the Clery Act, a crime is “reported” when it is brought to the attention of a campus security authority, the Public Safety Office, or local law enforcement personnel by a victim, witness, other third party or even the offender. It does not matter whether or not the individuals involved in the crime, or reporting the crime, are associated with the institution. All crime victims and witnesses are strongly encouraged to immediately report the crime to the campus Public Safety Office and the appropriate police agency in a timely manner. Prompt reporting will ensure timely warning notices on-campus and timely disclosure of crime statistics.

#### VOLUNTARY CONFIDENTIAL CRIME REPORTING

The Health Technology & Training Institute Public Safety Department along with the City of Philadelphia Police Department

encourages anyone who is the victim or witness to any crime to promptly report the incident to the police.

Except for communication made to pastoral counselors and licensed professional counselors, all CSAs have the obligation to report all offenses. CSAs are to report statistical information which may not include personal identifiers.

Confidential reports that provide sufficient detailed information for classification of the offense by using the FBI Uniform Crime Reporting Guidelines will be included in crime statistics.

#### TIMELY WARNING

The Health Technology & Training Institute will immediately notify the campus community upon the confirmation of a significant

emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus.

Health Technology & Training Institute will, without delay, and taking into account the safety of the community, determine the

content of the notification and initiate one or more of the listed notification systems, unless the notification will, in the professional judgment of responsible authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency. The warning will keep victim identities confidential to the fullest extent possible.

This notification will involve one or more of the following delivery methods:

## EMERGENCY RESPONSE AND EVACUATION PROCEDURES

The Health Technology & Training Institute recognizes its responsibility to provide accurate and timely information to the campus community during emergencies. The policy established by the Crisis Management Team establishes the approval process, criteria, and method for communicating with the students, faculty, and staff in the event of an emergency at any of its locations.

An evacuation is implemented under conditions when it is no longer safe for students, faculty, and staff to remain in a building or a specific area in a building. This requires occupants to move out and away from a building to a designated rally point and away from a specific area within a building. It is most commonly used when there is a suspected fire or hazardous material spill in a building.

In the event that you must evacuate, you should:

1. **WHEN THE FIRE ALARM SOUNDS, LEAVE AT ONCE.** Close the doors behind you and proceed into the fire exit and **LEAVE THE BUILDING.**
2. **DO NOT USE THE ELEVATORS.** If the power fails, the elevators will stop, causing the occupants to become trapped. Since elevator shaft ways are like chimneys, smoke could enter the elevator shaft thereby asphyxiating the occupants who are trying to evacuate the building.
3. Feel the door that leads from your area to the corridor before opening it. If it is hot or smoke is seeping in, do not open. If you cannot reach the fire exit, keep the door closed and seal off any cracks. Use the telephone to call the Fire Department by dialing 9-1-1, and give the address of the building, the floor you are on, and the office number.
4. Stay low if caught in smoke or heat. Take short breaths through your nose until you reach an area of Refuge.
5. If the door feels cool, open cautiously. Be prepared to close it quickly if the corridor is filled with smoke or if you feel heat pressure against the door. If the corridor is clear, precede with the building evacuation instructions.
6. Keep moving for at least 200 feet and proceed to the designated rally point after leaving the building.
7. People with needs should plan to evacuate to an area of refuge (fire tower). Once there, call Public Safety at 215-568-2220 or the Fire Department – 911. Identify your location and floor, being sure to indicate if you require special equipment to descend the stairs. Plan in advance to have a responsible person to assist during an emergency.

**Area of Refuge:** If your floor has to be evacuated, relocate to a protected area, such as oversized landings in firesafe stairwells on the floor. Next, call Public Safety (215-568-2220) or the Fire Department (911) and provide your location. Wait in the protected space until fire department personnel can remove you. **Personal Preparedness:** Plan in advance to have a responsible person assist you in the event of fire. Use a “buddy” system to help you get to a protected area. Anticipate situations where the “buddy” may not be available in an emergency.

Fire towers are enclosed stairways that have fire-rated doors and walls that provide a refuge from smoke and heat in a fire emergency. Doors leading into fire towers are inspected periodically to ensure that they open and close properly and should never be tied or propped open. Fire towers cannot be used for storage or as smoking areas. Fire towers are to be clean, well-lit, and free of obstructions at all times. Fire towers are an Area of Refuge.

### Shelter-in-Place Procedure

A shelter in place warning may be issued when conditions outside the building are unsafe due to severe weather, an airborne hazard, civil disturbance or other emergency. Notification to shelter in place may be made using all means of communication available. Once issued, individuals should immediately seek shelter inside the nearest campus building until the “All Clear” is given.

The basic steps of Shelter in Place are as follows:

1. Stay inside your building.

2. Move to interior rooms or hallways.
3. Close all exterior windows and doors to prevent inadvertent opening.
4. Turn off all heating, ventilation, and air conditioning (HVAC) systems (if manual controls are present) if the hazard is identified as a chemical, biological or radiological release.
5. Cover or seal the windows if possible.
6. Await further instructions.
7. Do not evacuate the building until the “All Clear” is given by emergency personnel.

## CAMPUS GEOGRAPHY

Crimes are reported as having occurred in one of four categories

- 1) On-Campus is defined as any building or property owned or controlled by HTTI which is within the same reasonably contiguous geographic area of the institution and used by the institution in direct support of, or in a manner related to, the institution's educational purposes and property within the reasonably contiguous area that is owned by the institution but controlled by another person which is used by students and supports institutional purposes (such as food or other retail vendors).
- 2) Residence Hall is defined as any student housing facility that is owned or controlled by HTTI or is located on property that is owned or controlled by HTTI which is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility.
- 3) Public Area is defined as all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.
- 4) Non-Campus Property is defined as any building or property owned or controlled by a student organization recognized by the institution and any building or property (other than a branch campus) owned or controlled by an institution of higher education that is used in direct support of, or in relation to, the institution's educational purposes, is used by students and is not within the same reasonably contiguous geographic area of the institution.

## CRIME PREVENTION EDUCATION AND AWARENESS

HTTI Office of Public Safety offers crime awareness, safety, and security presentations during orientation programs for parents, new students, and new employees. Know the Code and Campus Safety presentations center on crime awareness and prevention, campus security policies and procedures, and how to Contact HTTI Office of Public Safety Department for any assistance needed.

Information concerning crime prevention and awareness is also made available through crime alert and community awareness bulletins, HTTI Office of Public Information, crime prevention posters and brochures.

## SAFETY TIPS

Here are some tips on how to protect yourself and your property on and off campus:

- ◇ Do not travel alone at night when possible. Use HTTI's Escort Service or take a friend along.
- ◇ If you must travel alone, use well-lit streets in populated areas.
- ◇ Always let a friend or roommate know where you are going and when you should return.
- ◇ Do not lend your residence key to anyone. Do not hide your keys under a mat or in other obvious places.
- ◇ Always keep residence doors shut and locked, even if you are just going down the hall. Close and lock windows whenever you leave the room.

- ◇ Keep valuables out of sight.
- ◇ Do not leave laptops, smart phones, books, wallets, purses, or supplies unattended in classrooms,
- ◇ Park your car in a supervised lot when possible. Keep your car locked, even when you're in it.
- ◇ Secure bicycles on the racks located throughout the campus.
- ◇ Learn fire emergency routes.
- ◇ Keep emergency phone numbers handy.
- ◇ Report all thefts, accidents and incidents to the Office of Public Safety immediately.

#### HEALTH RISKS OF ALCOHOL AND OTHER DRUGS

Alcohol depresses the central nervous system, slowing the thought process, reflexes and other physical skills. Under the influence of alcohol, a person may become confused, moody, angry, emotional and disoriented. Larger doses can result in unconsciousness, coma and/or death. Dangers associated with alcohol use include addiction, damage to key organs, automobile accidents, social problems, and birth defects, among other negative consequences.

Marijuana impairs physical coordination, sensory perception, judgment, reasoning skills and memory. Marijuana use has also been linked to chronic anxiety disorders and schizophrenia, among other mental health problems. Ecstasy can cause severe depression, fatigue, internal hemorrhaging (bleeding), permanent brain damage and failure of body organs including the kidneys, heart and liver.

Cocaine, LSD (acid), and heroin, among other drugs, impact the mind and body in different ways, but each has dangerous or deadly consequences. Cocaine, for example, raises blood pressure, heart rate and body temperature; narrows arteries; restricts blood flow to the heart; causes tremors, convulsions, nausea and vomiting and can lead to failure of the respiratory system. Hallucinogenic drugs such as Acid cause severe psychological distress including panic and psychotic episodes that can last for weeks or months and return as flashbacks years later.

#### SANCTIONS FOR ALCOHOL VIOLATIONS

The disciplinary response to alcohol policy violations provides a balance between punitive action and an opportunity for education and personal growth. These sanctions are applicable to both residential and commuter students. Sanctions for alcohol violations accumulate over the duration of a student's matriculation at The Health Technology & Training Institute.

A HTTI conduct review body determines the sanctions imposed by HTTI for students (see Standard Sanctions section). Generally, the minimum sanctions for violations of the alcohol policy are:

- First Violation: Alcohol education, monetary fine and probation.
- Second Violation: Alcohol education to include a mandated alcohol assessment, monetary fine and continued probation.
- Third Violation: Alcohol education to include a mandated alcohol assessment, parent/guardian notification (if under age of 21), monetary fine, continued probation and loss of privileges (guest or building access)..
- The parents/guardians of dependent students are informed of alcohol violations by HTTI personnel (see Student Records policy).
- A conduct review body may alter the above sanctions at their discretion in certain circumstances depending upon the quantity and type of alcohol involved in a case or by the number of people impacted by the violation, among other factors.
- All funds collected as a result of alcohol policy fines are credited to a Student Affairs account dedicated to alcohol education efforts, non-alcoholic events, and community-building programs on campus.

## SANCTIONS FOR DRUG POLICY VIOLATIONS

The disciplinary response to drug policy violations provides a balance between punitive action and an opportunity for education and personal growth. These sanctions are applicable to both residential and commuter students.

Sanctions for drug violations accumulate over the duration of a student's matriculation at HTTI of the Arts.

A HTTI conduct review body determines the sanctions imposed by HTTI for students (see Standard Sanctions).

Generally, the minimum sanctions for violations of the drug policy are:

- First Violation: Drug education including a mandated drug assessment, monetary fine and possible suspension from HTTI housing. Commuter students face drug education including a mandated drug assessment, monetary fine and possible suspension from all non-academic facilities and events.
- Second Violation: Possible minimum of one (1) semester suspension from HTTI for use; one (1) year suspension from HTTI for distribution.
- Third Violation: Possible expulsion from HTTI.
- The parents/guardians of dependent students are informed of drug violations by HTTI personnel (see Student Records policy).
- A conduct review body may alter the above sanctions at their discretion in certain circumstances depending upon the quantity and type of drugs involved in a case or by the number of people impacted by the violation, among other factors.
- All funds collected as a result of drug policy fines are credited to a Student Affairs account dedicated to drug education efforts and community-building programs on campus.

## TITLE IX COORDINATOR

HTTI's Title IX Coordinator is responsible for monitoring compliance with Title IX; tracking and reporting annually on all incidents in violation of this policy; and coordinating HTTI's investigation, response and resolution of reports made under this policy. To contact HTTI's Title IX Coordinator, please e-mail [titleix@HTTI.edu](mailto:titleix@HTTI.edu) or visit [www.HTTI.edu/titleix](http://www.HTTI.edu/titleix).

## REPORTING RESPONSIBILITIES OF HTTI EMPLOYEES

With the exception of the confidential resources listed in this policy, all HTTI employees, full and part-time, regardless of tenure or contractual status, are considered "Responsible Employees" and are mandated to report any incidents of misconduct under this Policy to HTTI's Title IX Coordinator. Responsible Employees are required to share with the Title IX Coordinator all known information, including the identities of any alleged Respondent (if known), the identities of any Complainants, the names of other witnesses involved in the alleged misconduct, as well as all other relevant facts of which the Responsible Employee is aware, including the date, time, and location of the incident and any statements made by parties or witnesses.

## STATEMENT ON PRIVACY AND CONFIDENTIALITY

HTTI is committed to protecting the privacy interests of all individuals involved in a report of sexual or gender-based harassment or misconduct. In any report, investigation or resolution of an allegation of sexual and gender-based harassment or misconduct, every effort will be made to protect the privacy interests of the individuals involved in a manner consistent with the need for a thorough review of the allegation and the protection of any individual or the broader campus community. Information related to a report of harassment or misconduct will be shared only with those HTTI employees who "need to know" in order to assist in the investigation and/or resolution of the complaint. At all times, the privacy of the parties will be respected and safeguarded. All HTTI employees who are involved in the review, investigation or resolution of a report, including conduct board

members, have received specific training regarding the safeguarding of private information. Students or employees wishing to obtain confidential assistance on or access to campus resources without making a report to HTTI may do so by speaking with professionals who are obligated by law to maintain Confidentiality.

If a report of misconduct discloses an immediate threat to the health or safety of HTTI campus community, HTTI will issue a timely notice of the conduct to the community to protect the health or safety of the broader campus community, pursuant to the Clery Act.

Immediately threatening circumstances include, but are not limited to, recently reported incidents of sexual misconduct that include the use of force, a weapon, or other circumstances that represent a serious and ongoing threat to HTTI students, faculty, administrators, professional staff, or visitors.

All resolution proceedings are conducted in compliance with the requirements of FERPA, the Clery Act, Title IX, and HTTI policy. No information shall be released from such proceedings except as required or permitted by law or HTTI policy.

#### CONDUCT PROHIBITED BY POLICY

The following conduct is strictly prohibited under the terms of this policy. The below-defined conduct is not to be construed as an exhaustive or all-inclusive list of prohibited conduct. Conduct not specifically described below but which nonetheless implicates the purposes and application of this policy described above should be considered prohibited conduct for reporting purposes.

HTTI will evaluate reports of conduct prohibited by this policy on a case-by-case basis.

##### Sexual Misconduct:

Sexual misconduct refers to a range of behaviors that includes, but is not limited to, sexual or gender-based harassment, sexual violence, sexual exploitation, relationship and interpersonal violence, stalking, and retaliation. These various forms of sexual misconduct are defined in more detail below. Some of these prohibited forms of conduct may also be crimes under Pennsylvania and/or federal law.

HTTI considers a variety of factors in determining whether particular reported behaviors meet the criteria of prohibited conduct, including: the type, frequency, and duration of the conduct; the identity and relationship of the persons involved; the number of individuals involved; the location of the conduct and the context within which it occurred; and the degree to which the conduct affected the Complainant(s).

HTTI evaluates whether particular reported behavior(s) may meet the definition of Sexual Misconduct from both a subjective and objective perspective. Additional factors to consider include whether the conduct was unwelcome and whether a reasonable person in that individual's position would have perceived the conduct as intimidating, hostile, offensive, or otherwise prohibited by this policy.

##### Sexual Harassment:

Sexual harassment is defined as any unwelcome verbal or non-verbal contact, sexual advance, request for sexual contact or sexual favors, or other unwanted conduct of a sexual nature where:

1. Submission to or rejection of such behavior is made implicitly or explicitly a term or condition of instruction, employment, advancement, evaluation or participation in any HTTI activity, program or benefit (commonly referred to as quid pro quo harassment); or
2. Such behaviors are sufficiently severe, persistent, or pervasive to have the purpose or effect of unreasonably interfering with an individual's academic or educational experience, working environment, or living conditions by creating an intimidating, hostile, or offensive environment (commonly referred to as hostile environment harassment). The purpose or effect will be evaluated based on the perspective of a reasonable person under similar circumstances.

Examples of conduct that could constitute sexual harassment include but are not limited to the following:

unwelcome jokes or comments; the use of sexually explicit or offensive language; unwelcome and repeated flirtations, propositions, or advances; displaying sexually suggestive or offensive objects, posters or other depictions about sex, gender, or gender expression; unwelcome comments about appearance; offensive, insulting, derogatory or degrading remarks; threatening to take or taking actions if sexual favors are not granted or complied with, or said advances are otherwise rebuffed; demands for sexual favors in exchange for favorable or preferential treatment.

**Gender-Based Harassment:**

Gender-based harassment is defined as any unwelcome verbal or non-verbal contact or conduct based upon sex or gender, sexual orientation, gender identity or gender expression. Gender-based harassment need not be specifically sexual in nature to be prohibited by this policy.

Gender-based harassment includes, but is not limited to, the following: physical assault or physical interference intended to harass on the basis of gender; inappropriate graphics or other displays of gender-degrading materials; sexist jokes, anecdotes, or slurs; and insulting, demeaning or derogatory conduct direct toward a person on the basis of their gender.

**Discrimination:**

Gender or sex-based discrimination is defined as the prejudicial treatment of another person because of that person's sex, gender, sexual orientation, gender-identity, or gender expression. Discrimination may include, but is not limited to, relationship and interpersonal violence can encompass a broad range of behavior, including, but not limited to, physical violence and sexual violence or the threat of such violence, emotional violence, and economic violence. Relationship and interpersonal violence may take the form of threats, assault, property damage, or violence, or threat of violence to oneself, one's sexual or romantic partner, or to the family members or friends of the sexual or romantic partner.

**Stalking:**

Stalking is defined as a course of conduct involving more than one instance of unwelcome conduct that causes a person to fear for their personal safety or to experience substantial emotional distress. Acts that together constitute stalking may include direct actions or actions communicated to or by a third party, or other means of communication. Substantial emotional distress is defined as significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Stalking includes the concept of cyberstalking, a particular form of stalking in which electronic media such as the Internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used to pursue, harass, or make unwelcome contact with another person in an unsolicited fashion.

Examples of stalking may include, but are not limited to:

- unwelcome and repeated visual or physical proximity to a person;
- repeated oral or written threats;
- extortion of money or valuables;
- unwelcome/unsolicited written communication, including letters, cards, emails, instant messages, and messages on online bulletin boards;
- unwelcome/unsolicited communications to or about a person, their family, friends, or co-workers; or
- sending/posting unwelcome/unsolicited messages with an assumed identity; or
- explicitly or implicitly threatening physical contact; or
- any combination of these behaviors directed toward an individual person.

**Retaliation:**

Retaliation is defined as any adverse action taken or threat made against an individual or group of individuals for filing a complaint or report under this policy; filing an external complaint or report, including but not limited to



reports to law enforcement; or participating in HTTI's investigative or disciplinary process related to a complaint or report under this policy.

Examples of retaliation include, but are not limited to: threatening reprisals or retribution against an individual who complained or cooperated with an investigation arising under the terms of this policy; unfairly changing the evaluations, assignments or working, studying, or living conditions of such an individual; acts of abuse or violence; and any other conduct that has or is intended to have a materially adverse effect on the working, academic, social or living environment of an individual.

#### RESOURCES AND REPORTING

Immediate/Emergency Assistance Resources:

HTTI encourages those who have experienced sexual or physical violence to utilize emergency assistance.

Law Enforcement:

In the event of an emergency, please call 911, and then notify Public Safety on the emergency line: 215-568-2220.

You may also make a report directly to a HTTI Public Safety Officer (PSO). Public Safety officers are stationed in HTTI buildings. When a PSO receives a report of sexual misconduct, they will notify the Professional On-Duty (POD) staff member, who is trained to inform reporting parties of the options and resources available.

Medical:

Those who have experienced conduct prohibited by this Policy are strongly encouraged to seek medical treatment. A medical provider can provide emergency and/or follow-up medical services, and the opportunity to discuss any health care concerns in a confidential medical setting. A medical exam following a sexual assault has two goals: first,

to diagnose and treat the full extent of any injury or physical effect (sexually transmitted infection or pregnancy) and second, to properly collect and preserve evidence. There is a limited window of time (typically 72 to 96 hours) following an incident of sexual assault to preserve physical and other forms of evidence.

#### **Off-Campus:**

The Philadelphia Sexual Assault Response Center (PSARC) is designated to provide forensic rape examinations to victims of sexual assault. It is recommended that individuals who wish to pursue legal action receive this examination, which includes a collection of evidence. You do not need to file a police report to receive services at PSARC. PSARC is located within the same building as the Philadelphia Police Department Sexual Victims Unit.

During

this examination, you can receive treatment for injuries and sexually transmitted infections (STIs) as well as emergency contraception. You are not responsible for payment of the medications or medical forensic examination.

Location: 300 E. Hunting Park Avenue, Philadelphia, PA 19124

Phone: 215-800-1589

Transportation to PSARC can be provided by the Philadelphia Police Department.

#### **Off-Campus:**

Philadelphia Center Against Sexual Violence (formerly known as WOAR) – The Philadelphia Center Against Sexual Violence provides free and confidential individual and group counseling to children and adults who have experienced sexual violence: this includes sexual abuse, sexual assault, rape/date rape, and incest.

Website: [www.woar.org](http://www.woar.org)

24-Hour Hotline: 215-985-3333

Women Against Abuse - Women Against Abuse provides a number of services to victims of abuse, including 24-hour emergency safe havens, legal advocacy and representation, long-term housing and supportive services, and



more.

Location: 100 South Broad Street, Suite 1341, Philadelphia, PA 19110

Phone: 215-386-1280

Website: [www.womenagainstabuse.org](http://www.womenagainstabuse.org)

The Philadelphia Domestic Violence Hotline

24-Hour Hotline: 1-866-723-3014

National Sexual Assault Hotline

24-Hour Hotline: 1-800-656-4673

National Domestic Violence Hotline

24-Hour Hotline: 1-800-799-7233

Law Enforcement:

Members of HTTI's community are encouraged, but not required, to report incidents of prohibited conduct under this policy to local law enforcement. At the Complainant's request, HTTI will assist the Complainant in contacting local law enforcement and will cooperate with law enforcement agencies if a Complainant decides to pursue the criminal process.

To file a criminal complaint directly with the Philadelphia Police Department: call 911 for an emergency, and 311 for a non-emergency.

Note: The filing of a criminal complaint does not reduce or eliminate HTTI's responsibility to address a report of misconduct under this Policy. Though HTTI may need to delay temporarily the fact-finding portion of an investigation while the police are gathering evidence, HTTI will not delay its investigation until the ultimate outcome of the criminal investigation or the filing of any charges, and may need to take interim measures to protect the Complainant and campus community.

Reporting Sexual Misconduct to HTTI

Individuals may report prohibited conduct to a Responsible Employee (as defined above), directly to HTTI and/or to outside law enforcement agencies. Disclosures to a confidential resource, such as individuals in the Student Counseling Center, will not be considered a report to HTTI. Please note that making a report of prohibited conduct is not the same as filing a formal Complaint.

### **AMNESTY**

HTTI encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. HTTI recognizes that an individual who has been drinking or using drugs at the time of the incident may be hesitant to make a report or provide information in connection with an investigation under this Policy because of the perceived potential for disciplinary consequences for their own conduct. When information is uncovered through the Title IX investigative process that involves alcohol or drug usage in violation of the Student Handbook, this information will not be used to pursue any disciplinary action for alcohol or drug use, provided that any such violations did not and/or do not place the health or safety of any other person at risk. HTTI may, however, initiate an educational discussion or pursue other educational remedies regarding alcohol or other drugs.

Student health and safety are of primary concern of HTTI. As such, in cases of significant intoxication as a result of alcohol or other substance abuse, we encourage individuals to seek medical assistance for themselves or Others.



### **INITIAL REVIEW OF A REPORT**

Upon receipt of a report of prohibited conduct under this Policy, the Title IX Coordinator and/or other appropriate HTTI administrators will make an initial review of the known information and respond to any immediate health or safety concerns raised by the report, including but not limited to the possible use of interim measures described below. An initial review may lead the Title IX Coordinator to determine that it is necessary for the HTTI to proceed with a formal investigation regardless of whether there is a formal complaint, also described in further detail below.

An individual making a report of sexual misconduct under this Policy can expect information regarding:

- The right to seek medical treatment, and explain the importance of obtaining and preserving forensic and other evidence;
- The right to contact law enforcement or to decline to contact law enforcement;
- The right to seek a protective order;
- The available HTTI and community resources;
- The right to request reasonable academic, housing, employment, and other accommodations;
- The right to seek informal resolution or formal resolution under this Policy;
- HTTI's prohibition against retaliation; and
- Any other relevant information that may address the particular individual's safety or procedural questions and concerns.

HTTI will provide written notice of the outcome of any formal resolution proceedings, including the determination of a Policy violation and the imposition of any sanction(s) to both parties.

Sanctions that may be imposed under this Policy include, but are not limited to:

- Verbal Warning: An in-person meeting with the Title IX Coordinator, the Respondent's supervisor or other appropriate administrator, to discuss behavioral expectations and standards for HTTI community members.
- Written Warning: Notice, in writing, that continuation or repetition of prohibited conduct may be cause for additional disciplinary action.
- Educational Requirements: Completion of training, projects, programs, or requirements designed to help the employee manage behavior and understand why it was inappropriate. Includes appropriate and relevant community service opportunities.
- Suspension: Exclusion from HTTI premises, attending classes, and other privileges or activities for a specified period of time, as set forth in the suspension notice. Notice of this action will remain in the employee's file. Conditions for return to work may be specified in the suspension notice.
- Termination: Permanent termination of employment status and exclusion from HTTI premises, privileges, and activities. This action will be permanently recorded in the employee's file.
- Other discipline may be imposed instead of, or in addition to, those specified above. More than one of the disciplinary outcomes listed above may be imposed for any single violation.

HTTI may issue a single sanction or a combination of sanctions. Sanctions may include, but are not limited to, the following:

- Warning: A written notification that a violation of the Student Code of Conduct occurred and that any further responsible finding of misconduct may result in more severe disciplinary action. Warnings are typically recorded for internal purposes only and are not considered part of a student's permanent student conduct record. Though disclosed with a student's signed consent, a student who receives a warning is still considered in good standing.
- Probation: A written notification that indicates a serious and active response to a violation of the Student Code of Conduct. Probation is for a designated period of time and includes the probability of more severe

sanctions, if found responsible for additional violations of the Student Code of Conduct, including suspension or expulsion fromHTTI. Notification of probation is considered a change in good standing status.

- Loss of privileges: Denial of the use of certain HTTI facilities or the right to participate in certain activities, events, programs, or to exercise certain privileges for a designated period of time.
- Restitution: A student may be required to make payment to an individual or toHTTI related to the misconduct for damage, destruction, defacement, theft, or unauthorized use of property.
- Fines: The Health Technology & Training Institute reserves the right to impose fines, as appropriate, in addition to requiring payment for costs resulting from or associated with the offenses.
- Relocation or removal from (HTTI-operated) housing: Relocation is the reassignment of a student from one living space to another. Removal from housing is the removal of a student from all HTTIoperated housing. Relocation and removal from housing are typically accompanied by the loss of privileges regarding the visitation to specific residential areas for a specified period of time.HTTI may take such action for remedial, rather than disciplinary purposes.
- Revocation of Affiliation: Revocation of affiliation is the permanent removal of a student as a member of a specific organization and/or the permanent removal of an organization's recognized affiliation with the HTTI.
- No Contact Directives: No Contact Directives are directives to students that restrict the contact and/or communication between or among designated parties. No Contact Directives may be the result of a student conduct process or put in place temporarily. No Contact Directives are not legal protective orders as those are issued by a court of law.
- Persona Non Grata: Persona Non Grata prohibits an individual from a specific or all campus property. Violation of a persona non grata may subject the violator to arrest for trespass.
- Educational/Assessment/Referrals:HTTI reserves the right to impose counseling or substance assessments or other required educational sanctions.

Suspension: The separation of a student fromHTTI for a specified period of time, after which the student is eligible to return. Conditions for re-enrollment may be required and will be included in the notification of suspension. During the period of suspension, the student may not participate in HTTI academic or extracurricular activities and may be barred from all property owned or operated by the HTTI. Suspension fromHTTI will result in automatic “W” grades in all classes for the semester in which suspension was sanctioned. Students who are suspended may not be on campus without specific, written permission of the Associate Vice President for Student Affairs or designee. Suspension is for a designated period of time and includes the probability of more severe sanctions, including expulsion, if found responsible for violations of the Student Code of Conduct. Notification of suspension will normally be sent to parents, as it results in a change in good standing status.

• Expulsion: Expulsion is the permanent separation of the student fromHTTI. Expulsion from the HTTI will result in automatic “W” grades in all classes for the semester in which expulsion was sanctioned. Students who are expelled may not be on campus without specific, written permission of the Associate Vice President for Student Affairs or designee. Notification of expulsion will normally be sent to parents, as it results in a change in good standing status.

The following sanctions, among others, may be imposed upon student groups or organizations:

- Deactivation: Loss of privileges, including HTTI recognition, for a specified period of time.

More than one of the above sanctions listed may be imposed for any single violation. Other than HTTI expulsion, disciplinary sanctions shall not be made part of the student’s academic transcript but shall become part of the student’s permanent record. A student’s permanent record is, subject to review only by those authorized to request it, such as transfer

## CAMPUS SEXUAL ASSAULT VICTIMS' BILL OF RIGHTS

(Excerpt from Student Handbook)

In accordance with section 485 of the Higher Education Act of 1965, the Health Technology & Training Institute has implemented

the following bill of rights that shall be afforded to all victims of reported campus-related sexual assaults. These rights have been adapted for HTTI from the language used in the Higher Education Act.

1. The right to have any and all sexual assaults against them treated with seriousness; the right, as victims, to be treated with dignity; and the right for campus organizations which assist such victims to be accorded recognition.
2. The right to have any sexual assaults committed against them investigated and adjudicated by the duly constituted criminal and civil authorities of the governmental entity in which the crimes occurred, if the victim so chooses; and the right to the full and prompt cooperation and assistance of HTTI staff in notifying the proper authorities. The foregoing shall be in addition to any campus disciplinary proceedings.
3. Victims have the right to be free from any kind of pressure from HTTI staff to: a. not report crimes committed against them to civil and criminal authorities or to public safety and student life staff; or b. report crimes as lesser offenses than the victims perceive them to be.

The right to be free from any kind of suggestion that sexual assault victims not report, or under-report, crimes because: a. victims are somehow 'responsible' for the commission of crimes against them; b. victims were negligent or assumed the risk of being assaulted; or c. by reporting crimes they would incur unwanted personal publicity.

4. The same right to legal assistance, or ability to have others present, in any campus disciplinary proceeding that the institution permits to the accused; and the right to be notified of the outcome of such proceeding.
5. The right to counseling services from any mental health services previously established by the institution, or by other victim-service entities, or by victims themselves.
6. After campus sexual assaults have been reported, the victims of such crimes shall have the right to require that appropriate HTTI staff take the necessary steps or actions reasonably feasible to prevent any unnecessary or unwanted contact or proximity with alleged assailants, including immediate relocation of the victim to safe and secure alternative housing and transfer of classes if requested by the victims.
7. The right to report any inappropriate action, or lack thereof, in the handling of a reported sexual assault on the part of HTTI as a Title IX complaint.

## DATABASE OF REGISTERED SEX OFFENDERS IN PENNSYLVANIA

The Federal Campus Sex Crimes Prevention Act went into effect on October 28, 2002. The law requires institutions of higher education to issue a statement advising the campus community where state law enforcement agency information concerning registered sex offenders may be obtained. It also requires the sex offender, already registered in a state, to provide notice to each institution of higher education in that state, as to where the person is employed, carries on a vocation, or is a student. Presently Pennsylvania State law does not require a sex offender to list the school of higher education of which he or she is a student.

The Commonwealth of Pennsylvania maintains a system for making certain registry information on violent sex offenders available to the public. Presently the only individuals listed on the 'public disclosure' registry list, are those classified under Megan's Law, as sexual predators or those individuals having moved to Pennsylvania and are on parole/probation for a sexual offense in that state from which they moved.

The information published above is in compliance with the PA College and HTTI Security Information Act (PA Act 73 of 1988) and the Federal Student Right to Know and Campus Security Act of 1990 (P.L. 101-542) as amended through Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (34CFR668.41 and 34CFR668.46). [www.pameganslaw.state.pa.us/](http://www.pameganslaw.state.pa.us/)

## **CRIME STATISTICS**

Under the Clery Act, for the purposes of counting and disclosing Criminal Offense, Hate Crime, arrest and disciplinary referral statistics HTTI must do so based on definitions provided by the Federal Bureau of Investigation's (FBI's) Uniform Crime Reporting (UCR) Program. The definitions for Murder, Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Weapons Carrying, Possessing, Etc. Law Violations, Drug

Abuse Violations, and Liquor Law Violations are from the Summary Reporting System (SRS) User Manual from the

FBI's UCR Program. The definitions of Fondling, Incest and Statutory Rape are from the FBI's National Incident-Based Reporting System (NIBRS) Data Collection Guidelines edition of the UCR. Hate Crimes are classified according

to the FBI's Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Manual.

For the categories of Domestic Violence, Dating Violence and Stalking, the Clery Act specifies that HTTI must use the definitions provided by the Violence Against Women Act of 1994 and repeated in the Department's Clery Act regulations.

It is possible that institutions may be asked to code incidents using different definitions for purposes other than Clery Act reporting. However, for Clery Act purposes, it is essential that institutions classify and count reported incidents based on the definitions specified by the Clery Act. HTTI includes in the crime statistics the number of all reported offenses, without regard to the findings of a court, coroner or jury, or the decision of a prosecutor. Classifying and counting crimes from the records of calls for service, complaints and investigations. In addition, The Pennsylvania Uniform Crime Reporting Act mandates the release of crime statistics and rates to registered students and employees, and, upon request, to new employees and applicants for admission. The index rate is calculated by multiplying the actual number of reported offenses by 100,000 (a theoretical population for comparison purposes) and dividing that product by the number of HTTI's Full Time Equivalent (FTE) students and employees. The FTE is calculated using a state required formula.

## **CRIME LOG**

The Health Technology & Training Institute Office of Public Safety maintains a crime log of each recorded criminal offense and noncriminal

incident reported to the Department. Additional information such as the case number, date and time the report was made to HTTI Public Safety Department, the date and time the incident occurred (if known), the general location where the incident occurred, and the disposition of the report is also included.

Dispositions of incidents recorded in the Log will be one of the following:

- Open – This disposition designates a case that is under investigation or has otherwise not been closed or has been referred to another agency or Department.
- Pending – This disposition designates a case that is pending court action or has been referred to another agency or court.
- Closed – This disposition designates a case that is no longer under active investigation, has been adjudicated in court, has been referred to another agency, or has reached a point where there is no further action to be taken by the Department. This status also including cases where no further leads are available or the victim has decided to not participate.
- Disciplinary Referral – This disposition designates a case that has been referred to another HTTI Department for action under Health Technology & Training Institute policies and procedures and the HTTI Office of Public Safety is no longer the primary acting agency on the case.
- Unfounded – This disposition is only used by sworn or commissioned law enforcement authority. HTTI Public Safety Department are unsworn personnel.

**HTTI CRIME STATISTICS FOR FEDERAL REPORTING PURPOSES**

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes (formed by the Federal Student Right to-Know and Campus Security Act) require the reporting of statistics for certain criminal incidents, arrests, and disciplinary referrals. The law requires that the crime statistics be broken down according to the following geographical locations on campus; A) On-Campus, which includes Residential Halls; B) Residential; C) Non Campus, which includes non-contiguous properties controlled by HTTI and used in direct support or in relation to HTTI's educational purposes; and D) Public property, defined as property immediately adjacent to HTTI that does not include private apartments or businesses. Further, the Clery Act mandates the reporting of "Hate Crimes" (motivated by bias or prejudice) and disciplinary referrals for alcohol, drugs and weapons that are a violation of law. In addition, VAWA amended the Clery Act to require institutions to compile statistics for incidents of dating violence, domestic violence, sexual assault, and stalking incidents in their annual security reports. This disclosure is made in the following tables:

**Criminal Offenses Reporting Table**

<b>OFFENSE</b>	<b>YEAR</b>	<b>ON -CAMPUS PROPERTY</b>	<b>PUBLIC PROPERTY</b>
MURDER	2018	0	0
	2019	0	0
	2020	0	0
RAPE	2018	1	0
	2019	0	0
	2020	0	0
FONDLING	2018	0	0
	2019	0	0
	2020	0	0
INCEST	2018	0	0
	2019	0	0
	2020	0	0
STATUTORY RAPE	2018	0	0
	2019	0	0
	2020	0	0
ROBBERY	2018	0	0
	2019	0	3
	2020	0	11
AGGREVATED ASAULT	2018	0	20
	2019	0	26
	2020	0	17



BURGLARY	2018	0	0
	2019	0	0
	2020	11	11
MOTOR VEHICLE THEFT	2018	0	0
	2019	0	0
	2020	0	1

**THE PENNSYLVANIA UNIFORM CRIME REPORTING ACT**

The Pennsylvania Uniform Crime Reporting Act requires the release of crime statistics and rates to students and employees, and it requires that those statistics be available to applicants and new employees upon request. This table summarizes the number of offenses for all reported campus crimes for the most recent three-year period. Please note that the state crime classifications for which HTTI is reporting these statistics vary from the crime classifications under Federal law, which are also published in this report. The crime rate index per 100,000 populations is determined by multiplying the number of offenses in the most recent years by 100,000 then dividing by the campus FTE (full time equivalent) population of 2411 for 2019, 2,448 for 2018 and 2,401 for 2017. These statistics are reported in accordance with PA College and HTTI Security Information Act (PA Act 73; 24 P.S. Sec. 2502-1, 2502-5)