

Peirce College Annual Security Services Report

2023

2023 Peirce College Security Services Report

The *2023 Peirce College Security Services Report* is made available to all students and employees in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Pennsylvania Uniform Crime Reporting Act and Chapter 33 of the Pennsylvania Code. All post-secondary institutions receiving federal funding are required to disclose campus crime statistics and security information. Each institution must:

- Collect, classify, and report crime statistics;
- Issue timely campus alerts providing members of the campus community with information necessary to make informed decisions about their health and safety;
- Establish procedures and policies and provide educational programs for students and employees regarding dating violence, domestic violence, sexual assault and stalking;
- Publish an annual security report and submit crime statistics to the U.S. Department of Education by October 1 of each year.

Please carefully review the information provided in this document, which reports on policies and data relating to the safety and security of the Peirce College Community. The *2023 Peirce College Security Services Report* is prepared under the direction of the Vice President Academic Affairs and Provost, and the Vice President, Finance and Administration, who oversees security services. Current and prospective students and employees are entitled to receive a print copy of this report upon submitting a request to the Associate Dean, Student Support Services, at 215-670-9251.

Peirce College Security

Location

At our new campus at 1608 Walnut Street, Suite 1900, everyone's safety is of paramount importance. In a shared work/learning environment, adherence to safety procedures is critical to protect people from harm. As a tenant in a large building, our protocols are integrated with the requirements of the building owner to ensure a cohesive emergency response. All employees, students, contract workers, volunteers, and guests are responsible for adhering to the College's Campus Safety Procedures and in doing so, are expressing our core values of Collaboration and Excellence.

In March 2023, the College moved our main campus to **1608 Walnut Street**, where we now occupy the entire 19th floor. The 12,000 square-foot space allows Peirce to create a flexible, modern and modular space aligned with the evolving needs of our institution and our students. Peirce's new campus is located in a Center City landmark, the former Sun Oil Building, an Art Deco masterpiece that served as the headquarters of the Sun Oil Company from the building's opening in 1928 to 1971. It is listed on both the National Register of Historic Places and Philadelphia Register of Historic Places.

The new location provides more flex space to better meet the changing needs of our students and our institution, including instruction and administrative space, student services, hoteling and collaborative space. Public parking and access to mass transit is closer to the new campus, which also has higher retail foot traffic that offers increased visibility to working adults and the general public.

Campus Access

Peirce has adopted telecommuting as its primary workplace and continues to offer all classes and student support services online. The campus was designed and staffed to augment the remote workplace and online education.

Standard office hours are 8:30am to 5:00pm Monday through Friday with modified hours for classes and events as scheduled. The specific office hours for each week will be posted to the college's room reservation system. For information about reserving a room for a campus visit, meeting, or event, please refer to the Facilities website on the Intranet at my.peirce.edu.

For your safety, access to campus is permitted only during the published hours of operation. No one is allowed to be in the suite by themselves. Access requires at least 2 (two) people, one of whom is a Primary Emergency Warden.

Emergency Procedures/Policies/Protocols

In compliance with the building's rules, Peirce College has appointed Emergency Wardens to act as coordinators in the event of an emergency. **All individuals must follow the instructions of the Emergency Wardens.** See table below for designated Emergency Wardens.

PRIMARY	Facilities Technician	During standard business hours and modified hours for classes and events
PRIMARY	President's Council Members	If Facilities Technician is not on-site, during standard business hours and modified hours
SECONDARY	Faculty	During classroom hours
SECONDARY	Deans, AVP and Directors	Assist Primary Warden when on site
AIDS	Identified as needed	Provide assistance to individuals during evacuation

Specific responsibilities of the Emergency Wardens are described in **Appendix A**.

Standard Emergency Protocols

For all emergencies, call 911 and provide the following information

- Your full name
- Phone number you're calling from
- The office address of 1608 Walnut Street, Suite 1900, Philadelphia, PA 19103
- Nature and severity of the situation
- Exact location of hazard or event

Then, call building management at 215-732-1544 and provide the same information.

Emergency protocols for different types of emergencies are described in **Appendix B**.

Timely Warning

In the event that a situation arises, either on or near campus, that, in the judgment of the College, constitutes an ongoing or continuous threat, a "timely warning" will be issued to all individuals in our suite through a verbal announcement, and second, an email and emergency text. Anyone with information warranting a timely warning should inform the Primary Emergency Warden and, if the threat is imminent, follow the *Standard Emergency Protocols*.

Emergency Response

For our campus, there are two responses to an emergency – shelter in place or evacuate.

Shelter in Place means finding a safe location indoors and staying there until you are given an "all clear" or told to evacuate. You may be asked to shelter in place because of an active shooter, intruder, weather

event, natural disaster, street incident or other hazard.

Evacuate means exiting the building using the stairs. You may be asked to evacuate due to a fire, intruder, active shooter, gas leak, natural disaster, building damage, or other hazard.

The Primary Emergency Warden in coordination with building management will determine the course of action and provide instructions.

At least semi-annually, the College will conduct testing of these emergency response procedures to practice and improve our protocols. The testing may be announced in advance or unannounced. These tests will be conducted in coordination with building management to ensure an integrated and cohesive plan.

Special Needs Assistance - If you have a temporary or permanent disability that may impair your ability to respond in an emergency, please inform a Primary Emergency Warden when you are on campus.

It is a good safety habit for everyone to carry emergency health information and emergency contact numbers at all times.

Weapons and Threatening Behavior

The College wants to create a safe, productive environment for everyone, and as such, threatening and dangerous behaviors are taken very seriously. At College facilities and at any off-site College-sponsored event, the following is strictly prohibited:

- Weapons are not permitted. A weapon includes guns, rifles, fireworks, knives, explosives, bombs, and any other similar items. Unloaded firearms are prohibited; even an individual possessing a weapons permit is not permitted to possess or conceal any type of weapon.
- Threats of harm, written or oral, expressed or implied
- Physically assaulting, attacking, or otherwise intentionally causing injury to anyone
- Threatening to cause damage or actually causing damage to the property of others

The College reserves the right to search any person on College premises at any time, including personal items such as handbags and backpacks. Please see the College's **Information Technology Acceptable Use Policy** regarding searches of College technology assets.

Security Measures

The primary security measure for our suite is the locked elevator. The elevator will not automatically rise to the 19th floor and only Primary Emergency Wardens have elevator fobs. The front desk in the building lobby has been instructed not to activate the elevator or escort anyone to our suite. Instructions for coming to our suite are provided to employees when reserving a room and to students at the beginning of an on-campus course. Anyone who comes to campus may be required to show a valid picture state identification, such as a driver's license, before being escorted by a College employee to our suite. While the locked elevator and other safety measures provide a level of security, nothing is failsafe. We all must remain vigilant, prepared and thoughtful about our actions.

Accountability

The College takes its duty of care very seriously and expects that all employees, students, contract workers, guests, contracted and volunteers will adhere to these procedures. Because of the life/safety implications, employees and contract workers who fail to follow these procedures will be referred to Human Resources for disciplinary action. If a volunteer violates this policy, the employee responsible for

managing the volunteer will be referred to Human Resources, and the volunteer will no longer be permitted to work with the college. A guest who violates this policy will not be allowed at any college event in the future. Students will be referred to the Dean, Academic Advising & Registrar. Based on the nature and severity of the infraction, the College may refer the matter to law enforcement for further action.

Questions should be directed to the Vice President, Finance & Administration. The policy will be reviewed periodically and may be revised without notice.

Crime Reporting & Statistics

The Clery Act requires post-secondary institutions to report the following categories of crime statistics:

- Criminal Offenses—Criminal Homicide, including Murder and Non-negligent Manslaughter, and Manslaughter by Negligence; Sexual Assault,² including Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson;
- Hate Crimes—Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/ Vandalism of Property that were motivated by bias;
- VAWA Offenses—Any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense but is included in the Criminal Offenses category for Clery Act reporting purposes); and
- Arrests and Referrals for Disciplinary Action for Weapons—Carrying, Possessing, Etc. Law Violations, Drug Abuse Violations and Liquor Law Violations.

The College must include in our federal and state crime statistics reporting the number of all reported offenses classified and counted from the records of calls for service.

The crime statistics listed in this report and submitted to the Department of Education in October 2023 reflect crimes reported in calendar year 2022 and pertain to the College main campus location during 2022: 1420 Pine St., Philadelphia, PA. Per federal reporting procedures the data reported is for the previous calendar year. Peirce moved to its **1608 Walnut St.** location in spring 2023. Policies and procedures are current and pertain to our new location.

Reporting Crimes

The College strongly encourages the accurate and prompt reporting of all crimes to a Campus Security Authority (CSA). Peirce students, faculty members, staff, or visitors who observe a security incident or problem are encouraged to notify a CSA, but may also report criminal offenses to the Philadelphia Police Department.

CSAs are not responsible for determining authoritatively whether a crime took place—that is the function of law enforcement personnel. CSAs should not try to apprehend the alleged perpetrator of the crime. At Peirce College, CSAs are supervised by the Vice President, Finance and Administration, who directs reporting of a crime or suspected crime to local police and cooperates with investigations.

Campus Security Authority (CSA)

Under the *Clery Act*, a crime is “reported” when it is brought to the attention of a campus security authority or local law enforcement personnel by a victim, witness, other third party or even the offender.

Institutional statistics are based on reports of alleged crime incidents. It is not necessary for a crime to have been investigated by police or the campus security authority.

The Clery Act requires institutions to identify a Campus Security Authority (CSA) whose main function is to collect crime report information. CSAs are responsible for reporting allegations of crimes that are reported to them in their capacity as a CSA. They are **not** responsible for investigating or reporting incidents they may learn about in an indirect manner, i.e., overheard in the hallway, group discussion, etc.

At Peirce College, the Vice President, Finance and Administration, oversees security services and the College's Campus Security Authorities (CSAs). Peirce has designated the following CSAs:

Vice President, Finance and Administration	215-670-9218
Vice President, Academic Affairs & Provost	215-670-9265
Vice President, Enrollment Management & Student Services	215-670-9210
Associate Dean, Student Support Services	215-670-9423
Senior Director, Marketing & External Relations	215-670-9476
Chief Information Officer	215-670-9235
Associate Vice President, Human Resources & Chief Diversity/Inclusion Officer	215-670-9328

CSAs serve as a point of contact for students and employees regarding emergencies, crimes, and safety and security concerns. They alert the Vice President, Finance and Administration, when aware of known or suspected crime on campus, on public property, or on non-campus property per the requirements of the Clery Act. The Vice President, Finance and Administration, directs reporting of a crime or suspected crime to local police and cooperates with any investigations.

Peirce College does not maintain a campus police or security department and does not keep a daily crime log of alleged criminal incidents that is open to public inspection. Any incident requiring arrest on campus will be transferred to the jurisdiction of the Philadelphia Police Department.

Confidential Reporting

Peirce College encourages anyone who is the victim or witness to any crime to promptly report the incident to the local police by dialing 911. Because police reports are public records under state law, Peirce College cannot hold reports of crime in confidence, as required by federal, state, and local laws. Confidential reports for the purposes of inclusion in the annual disclosure of crime statistics can generally be made to the Associate Dean, Student Support Services; Vice President, Enrollment Management and Student Services or the Vice President, Academic Affairs and Provost.

Any individual may make an anonymous report concerning an act of sexual discrimination or Sexual Harassment (including Sexual Violence). An individual may report the incident without disclosing their name, identifying the Respondent, or requesting any action. Depending on the extent of information available, the College's ability to respond to an anonymous report may be limited. The College provides a 24/7/365 hotline at www.peirce.ethicspoint.com or (855) 857-5885.

The College prohibits retaliation against a student or employee who, in good faith, registers a complaint or brings such information to the College's attention. Violations of the law will be referred to law enforcement agencies and, when appropriate, to the Associate Dean, Student Support Services, or the Associate Vice President, Human Resources & Chief Diversity/Inclusion Officer, for review. In the event that a situation arises, either on or off campus, that, in the judgment of the College, constitutes an ongoing or continuous threat, a [campus wide] "timely warning" will be issued to students, faculty, and staff. This warning will be issued through the College email system, student portal, www.peirce.edu

website, and/or other means deemed appropriate by the College.

Off Campus

Peirce College does not monitor criminal activity occurring off campus. Any criminal activity occurring off campus in the vicinity of our new main campus located at 1608 Walnut Street is under the jurisdiction of local police departments and should be reported by dialing 911.

Peirce College does not maintain and/or support any officially recognized student organizations with off campus locations. Peirce College does not maintain any on-campus or off-campus student housing facilities.

Crime Prevention & Security Awareness Programs

Campus safety and security at Peirce College is a shared responsibility. The best protection against crime is an aware and informed campus community of students, faculty, staff, and visitors who exercise good judgment and caution.

The vast majority of our students, faculty, staff, and visitors do not experience crime at the College. Despite everyone's preventive efforts, unfortunately, crime sometimes occurs. As part of our commitment to campus safety and security, and in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Pennsylvania Uniform Crime Reporting Act, we provide crime prevention information during College orientations and throughout the year.

The following is an overview of programs and community awareness activities that the College provides on an ongoing basis:

Campus Safety Training/Professional Development

This training is to review procedures and best practices in response to a campus emergency. The training focuses on ways to best respond when there is a threat to the safety of members of the Peirce Community. Sexual Harassment & Assault Prevention/ Clery Act/Title IX training sessions are facilitated by the College's legal counsel for faculty, administration, and staff.

Timeframe: Every two years

The College ensures that its Title IX personnel have adequate training. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the College's Education Program or Activity, how to conduct an investigation, the College's Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Members of the Decision Panel are trained on the definition of Sexual Harassment, the Live Hearing process, the technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process.

Materials used to train Title IX personnel are posted on the College's website:

<https://www.peirce.edu/content/pdf/compliance/DMi-Webinar-TitleIX.pdf>

Testing of Emergency Response Procedures

At least semi-annually, Peirce College will conduct testing of emergency response procedures to practice and improve our protocols.

Safety/Awareness Messages to the Peirce College Community

Informing the College community about safe practices on an ongoing basis is helpful in educating individuals on ways to protect themselves. The College sends email messages at least three times a year to inform and remind the community (including faculty, staff, students, and administrators) about preventive and/or proactive measures they can take.

Timeframe: Periodic

New Student Orientation Programming

The College's orientation course provides students with information on sexual assault awareness and prevention, bystander education, survivor support, online dating safety, the College's Drug & Alcohol Policy and related resources.

Timeframe: Ongoing

Criminal Records

Peirce College conducts a criminal background check on all new hires during the application process. There is no policy for inquiring if students have a criminal record during the admission process. Students enrolled in the Health Information Technology program are required to submit to a criminal background check and other clearances prior to participating in the Professional Practice Experience (PPE).

Alcohol and Illegal Drugs

Peirce College maintains a strong commitment to programs that promote the health, well-being, and safety of its students and employees and the security of its premises. Consistent with this commitment, the College has established policies governing the unlawful use, consumption, possession, selling, distribution, dispensing, and manufacture of alcoholic beverages and illegal drugs. Please see the *Alcohol and Illegal Drugs Policy* in the *College Catalog* and the *Substance Abuse Policy* in the *College Policies* for employees located at College Policies for employees located at: my.peirce.edu

Peirce College complies with all federal, state, and local laws, which regulate the sale, possession, and use of **alcohol and illegal drugs** while on the premises of the College and while off campus participating in any College-sponsored activity or event. The College neither condones nor shields from prosecution any individual found in violation of the Pennsylvania liquor control laws.

With regard to alcoholic beverages and illegal drugs, Peirce College students are prohibited from the following:

- Using, consuming, possessing, selling, distributing, dispensing, or manufacturing alcoholic beverages while on the premises of the College and while off campus participating in any College-sponsored activity or event.
- Storing any alcoholic beverages on College premises.
- Being under the influence of alcoholic beverages while on the premises of the College or while off campus participating in any College-sponsored activity or event.

According to Pennsylvania state law, those under the age of 21 are prohibited to possess, consume, purchase, and furnish alcohol.

Members of the College community (including former students or graduates) while on College premises or while off campus participating in any College-sponsored activity or event are expected to conduct themselves in compliance with College policies, as well as conduct themselves in a manner in which they do not cause harm to themselves or others, and that they neither break laws nor contribute to the

negligence of others. The College reserves the right to revoke College privileges in such circumstances.

Members of the College community violating alcohol/substance policies or laws may be subject to sanctions by the College, disciplinary action, criminal prosecution, fines, and imprisonment.

Substance Abuse Education, Counseling, and Information

Peirce College is committed to providing educational programs and counseling to students (including alumni) and employees concerning the risks associated with alcohol and illegal drug use and/or abuse.

The Mary W. Walker '33 Center for Academic Excellence (215-670-9251) and the Human Resources Department (215-670-9217) provide drug and alcohol prevention information and programming. The Peirce College Catalogs and the College Policies for employees located at College Policies for employees located at: https://my.peirce.edu/ics/Intranet/College_Policies (login required), contain the College's substance abuse policies, information about drug and alcohol awareness, health risks, and resources on where to receive help and counseling, as well as College disciplinary actions. Please see the College's Community Calendar on the main page of the College portal, my.peirce.edu, for specific workshops and programs related to substance abuse.

The Pennsylvania Department of Health refers people to the Network of Drug and Alcohol Single County Authorities (SCA), which is responsible for coordinating all county alcohol and other drug prevention, intervention, and treatment efforts. **The Philadelphia SCA** provides the following contact information for people seeking treatment for Drug & Alcohol abuse:

- People on medical assistance from the state of PA, call 1-888-545-2600
- People without medical assistance, call 215-546-1200
- People with private insurance should contact their insurer for information.

Alcohol, Drug Use, and Legal Sanctions

The following is a summary of significant legal sanctions under Pennsylvania law for the unlawful possession or distribution of illegal drugs and alcohol. In addition, any student who is convicted under state or federal law involving the possession or sale of a controlled substance will be ineligible for federal student financial aid for specific periods of time, depending on the nature and number of the offense(s).

The Pennsylvania Vehicle Code as well as the Pennsylvania Crimes Code provide penalties pertaining to the **possession and distribution of alcohol**. Prohibitions include, among other things:

- **The Pennsylvania Vehicle Code, 75 Pa. C.S.A. § 3101 et seq.:**
Pennsylvania has set .08% Blood Alcohol Content (BAC) as the legal limit for driving under the influence convictions. This law prohibits, among other things, a driver in any vehicle from consuming any controlled substance in the vehicle while the vehicle is in operation on any highway in Pennsylvania. Any person who causes the death of an individual while driving under the influence will be guilty of a felony and shall be ordered to serve a minimum term of imprisonment of not less than three years. Any person who negligently causes serious bodily injury to another person while driving under the influence will be guilty of a felony of the second degree.
- **The Pennsylvania Crimes Code, 18 Pa. C.S.A. § 5505:**
Public Drunkenness - A person is prohibited from appearing in public manifestly under the influence of alcohol to the degree that he may endanger himself or herself or other persons or property or annoy other persons in the vicinity. Penalties range from a fine of up to \$500 (first

violation) to imprisonment for up to 90 days.

- **The Pennsylvania Crimes Code, 18 Pa. C.S.A. § 6307 et seq.:**

Misrepresentation of Age - Individuals are prohibited from misrepresenting one's age knowingly and falsely, in order to obtain liquor or malt or brewed beverages. Penalties range from a fine of up to \$500, imprisonment for up to one year and include suspension of license from 90 days to two years. It is also a crime to knowingly, willfully, and falsely to represent that another is of legal age to obtain liquor or malt or brewed beverages. Penalty is a minimum fine of \$300 and imprisonment for up to one year.

Purchase, Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverages by a Minor - Minors are prohibited from an attempt to purchase, consume, possess, or knowingly transport such beverages. Penalties range from fines of up to \$500, imprisonment of up to 90 days and license suspension of 90 days for first offenses; penalties for three or more offenses are up to \$1,000 in fines, imprisonment of up to 90 days, and license suspension for up to two years.

Prohibited Sale to Minors - It is a crime to intentionally and knowingly sell, furnish or purchase with intent to sell or furnish, any liquor, malt, or brewed beverages to minors. Penalty for a first violation is a minimum of \$1,000; \$2,500 for each subsequent violation; imprisonment for up to one year for any violation.

False Identification Cards - It is a crime intentionally, knowingly, or recklessly to manufacture, make, alter, sell, or attempt to sell an identification card falsely representing the identity, birth date, or age of another. Minimum fine is \$1,000 for the first violation; minimum of \$2,500 for subsequent violations; imprisonment for up to two years for any violation. It is also a crime to possess a false identification card or for a minor to obtain or attempt to obtain liquor or malt or brewed beverages by using a false identification card. Penalties range from a fine of up to \$500, imprisonment for up to one year and include suspension of license from 90 days to two years.

- Supplemental information may also be found at the website for the Pennsylvania Liquor Control Board, www.lcb.state.pa.us.

Laws pertaining to the **distribution and possession of illegal drugs** include:

- **The Controlled Substance, Drug, Device and Cosmetic Act, 35 Pa. Cons. Stat. § 780-101 et seq.**, prohibits, among other things, the manufacture, sale, distribution, or possession of any controlled substance. Penalties under the Act range in severity depending on the act committed and the controlled substance involved. First-time violators may be sentenced to imprisonment for up to one year, ordered to pay a fine up to \$5,000, or both. Repeat offenders may be sentenced to imprisonment for up to three years, ordered to pay a fine up to \$25,000, or both.
- **The Pharmacy Act, 63 Pa. Cons. Stat. § 390-8**, prohibits any person from, among other things, procuring or attempting to procure any drug through fraud, deceit, misrepresentation, subterfuge, by forgery or alteration of a material fact, or by the use of a false statement in any prescription. Any person who violates the Act may be sentenced to imprisonment for up to one year, ordered to pay a fine up to \$5,000, or both. For each subsequent offense, an individual may be sentenced to imprisonment for up to three years, ordered to pay a fine up to \$15,000, or both.
- **The Federal Controlled Substances Act, 21 U.S.C. § 801 et seq.**, prohibits, among other

things, the manufacture, distribution, dispensing, or possession, with intent to manufacture, distribute, or dispense, of a controlled substance. Penalties under the Act range in severity depending on the type and quantity of the controlled substance involved. The maximum penalties are life imprisonment, a fine of \$4,000,000, or both. Penalties are increased for repeat offenders. Double penalties apply when the violation of the law takes place within one thousand feet of the property of a school or college. The penalty for simple possession is a sentence of a term of imprisonment for up to one year, a minimum fine of \$1,000, or both.

- For more information about drug abuse and prevention, please visit www.drugabuse.gov.
- Additional Resources
 - *Department of Justice Office of Violence Against Women* www.usdoj.gov/ovw
 - *Pennsylvania Liquor Control Board* www.lcb.state.pa.us
 - *The Pennsylvania State Police Megan's Law website* www.pameganslaw.state.pa.us
 - *The U.S. Department of Health & Human Services Center for Substance Abuse Prevention (CSAP)* <http://www.samhsa.gov/prevention/>

Sexual Violence Policy (Awareness, Prevention, and Response)

Peirce College does not tolerate any form of sexual violence or sexual harassment including, but not limited to, domestic violence, dating violence, rape, stalking, sexual assault, or any other form of sexual offense. These behaviors are more generally addressed in the College's *Policy Prohibiting Sexual Harassment*, set forth under the *Equal Opportunity Policy* found in the *College Catalog* and in the College Policies for employees located at https://my.peirce.edu/ics/Intranet/College_Policies (login required). Information provided in this *Sexual Violence Policy* is intended to supplement and reinforce the College's *Policy Prohibiting Sexual Harassment* and the Title IX Policy at <https://www.peirce.edu/about-peirce/additional-resources/consumer-information/title-ix-policy>.

The College is committed to preventing the occurrence of sexual offenses including any sexual act directed at another person, forcibly and/or against the person's will; or not forcibly or against the person's will where the victim is incapable of giving consent. The College is also committed to offering educational programs to promote awareness of rape, acquaintance rape, domestic and dating violence, stalking, and forcible and non-forcible sex offenses, as well as taking appropriate actions in the event a sexual assault is reported. Such offenses may also violate federal, state, and local laws and those who engage in such acts may be subject to criminal prosecution.

Title IX Coordinator and Deputy Coordinator Contact Information

The Associate Vice President, Human Resources and Chief Diversity & Inclusion Officer, has been designated as the Title IX Coordinator to handle inquiries regarding nondiscrimination policies (including policies prohibiting harassment and retaliation) and to serve as the overall campus coordinator for purposes of Title IX compliance, and is available at cnrobinson@peirce.edu, or 215-670-9328.

In addition, the following individuals have been designated as Deputy Title IX Coordinators:

- The Associate Dean, Student Support Services, will serve as the Deputy Title IX Coordinator for matters related to prospective or current students, and is available at tathomas@peirce.edu, or 215-670-9423.
- The Associate Director, Faculty Recruitment & Professional Development, will serve as the Deputy Title IX Coordinator for matters related to prospective or current employees, and is

available at gamarte1@peirce.edu, or 215-670-9256.

The Title IX Coordinator, supported by the Title IX Deputy Coordinators, (collectively “Title IX personnel”) are responsible for the College’s compliance with Title IX. They receive complaints of sexual discrimination, ensure a fair and balanced grievance process, and administer the review, investigation, and resolution procedures. The Title IX Coordinator and Deputy Coordinators are trained in state and federal laws that apply to matters of sexual discrimination as well as College policies and procedures.

Prohibit Behaviors/Conduct

In determining whether alleged conduct violates this policy, the College will consider the totality of the facts and circumstances involved in the incident, including the nature of the alleged conduct and the context in which it occurred. Any of the prohibited conduct defined in this policy can be committed by individuals of any gender, and it can occur between individuals of the same gender or different genders. It can occur between strangers or acquaintances, as well as people involved in intimate or sexual relationships. Unacceptable conduct includes but is not limited to:

Sexual Discrimination
Sexual Harassment
Sexual Assault
Dating Violence
Domestic Violence
Stalking
Retaliation

Definitions

Sexual Discrimination is any conduct that subjects an individual to disparate treatment on the basis of gender identity, gender expression, pregnancy, marital status, sexual orientation. For this policy, it includes sexual harassment, sexual assault and sexual violence as described below.

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

1. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to an educational program or activity;
2. A College employee conditioning an educational benefit or service upon a person’s participation in unwelcome sexual conduct (often called “quid pro quo” harassment); or
3. Sexual Assault (as defined in the Clery Act), or Dating Violence, Domestic Violence or Stalking as defined in the Violence Against Women Act (VAWA) (collectively referred to as “Sexual Violence”):
 - Sexual Assault, as defined in 20 U.S.C. 1092(f)(6)(A)(v), means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation¹. It is actual or attempted sexual contact with another person without that person's consent, including but not limited to, physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent due to use of drugs and/or alcohol or to an intellectual or other disability.
 - Dating Violence, as defined in 34 U.S.C. 12291(a)(10), means violence (physical, emotional, psychological or sexual abuse) committed by a person a) who is or has been in a social

¹ The FBI’s Uniform Crime Reporting Program (FBI UCR) includes forcible and nonforcible sex offenses such as rape, fondling, and statutory rape, which contain elements of “without the consent of the victim.”

relationship of a romantic or intimate nature with the Complainant; and b) where the existence of such relationship shall be determined based on a consideration of: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.

- Domestic Violence, as defined in 34 U.S.C. 12291(a)(8), includes felony or misdemeanor crimes of violence (physical, emotional, psychological, or sexual abuse) committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. Intimate partner means a spouse; a former spouse; persons who have a child in common whether or not they have been married or lived together at any time; and persons who are or were involved in a dating relationship. Dating relationship means frequent, intimate associations primarily characterized by the expectation of affection or sexual involvement, but does not include a causal relationship or an ordinary association between persons in a business or social context. If you or someone you know is experiencing domestic abuse, there is help out there. Call the [National Domestic Violence Hotline](#): 1-800-799-SAFE (7233).
- Stalking, as defined in 34 U.S.C. 12291(a)(30), means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

Rape is defined as the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Statutory Rape is defined a sexual intercourse with a person who is under the statutory age of consent.

Coercion is the use of an unreasonable amount of pressure to gain sexual access. Coercion is more than an effort to persuade, entice, or attract another person to engage in sexual contact. When a person makes clear that they do not want to go beyond a certain sexual interaction, continued pressure can be coercive. In evaluating whether coercion was used, the College will consider: (i) the frequency of the application of the pressure; (ii) the intensity of the pressure; (iii) the degree of isolation of the person being pressured; (iv) the duration of the pressure; and (v) the relative positions within the College community of those involved.

Retaliation is any act or attempt to retaliate against or seek retribution from any individual or group of individuals involved in the investigation and/or resolution of a complaint under this policy.

Consent is an affirmative decision to engage in mutually acceptable sexual activity, and is given by clear words or actions. It is an informed decision made freely and actively by all parties. Consent may not be inferred from silence, passivity, or lack of resistance alone. Furthermore, consent to one form of sexual activity does not imply consent to other forms of sexual activity and the existence of a current or previous dating, marital, and/or sexual relationship is not sufficient to constitute consent to additional sexual activity. Consent cannot be obtained from someone who is asleep, unconscious, or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other condition. Consent cannot be obtained by threat, coercion, intimidation, isolation, confinement, or force. Agreement given under such conditions does not constitute consent.

Incapacitation is the inability to make informed, rational judgments and decisions. If alcohol or drugs are involved, incapacitation may be assessed by evaluating how the substance has affected a person's decision-making capacity, awareness, and ability to make informed judgments. The perspective of a

reasonable person will be considered in the College's determination of whether a person knew, or reasonably should have known under the circumstances, whether the other party was incapacitated. Being intoxicated or incapacitated does not diminish one's responsibility to obtain consent and will not be an excuse for sexual discrimination.

Complainant means the individual who is alleged to be the victim of conduct that could constitute Sexual Harassment, regardless of whether a Formal Complaint has been filed. A Complainant must be the alleged victim unless a parent or legal guardian has a legal right to act on the alleged victim's behalf.

Respondent is the individual who has been reported to be the perpetrator of conduct that could constitute Sexual Harassment.

Party(ies) refers collectively or separately to the Complainant and Respondent.

Decision-Maker refers collectively to the employees who will serve on the Hearing Panel and render a determination on the Formal Complaint.

Formal Complaint is a document (hardcopy or electronic) filed by a Complainant or signed by the Title IX Coordinator alleging Sexual Harassment against a Respondent and requesting that the College investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Title IX Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in the College's education Program or Activity with which the Formal Complaint is filed.

Preponderance of the evidence standard means that a finding is based on whether it is more likely than not that the Respondent violated the policy. In other words, the Hearing Panel concludes that there is a greater than 50% chance that the complaint is true.

Exculpatory evidence favorable to the Respondent

Inculpatory evidence favorable to the Complainant

Reporting Sexual Violence/Discrimination

Any person who believes they have been a victim of, have witnessed, or wish to report any incident of sexual violence or discrimination should contact one of the following institutional authorities:

- Carrie Robinson, Associate Vice President, Human Resources and Chief Diversity & Inclusion Officer/Title IX Coordinator, cnrobinson@peirce.edu, 215-670-9328;
- The Associate Dean, Student Support Services, will serve as the Deputy Title IX Coordinator for matters related to prospective or current students, and is available at tathomas@peirce.edu, or 215-670-9423;
- The Associate Director, Faculty Recruitment & Professional Development, will serve as the Deputy Title IX Coordinator for matters related to prospective or current employees, and is available at gamate1@peirce.edu, or 215-670-9256.

A report can be made at any time, including during non business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed.

A complaint may also be reported by a Mandatory Reporter, a College employee who must share knowledge, notice, and/or reports of sexual discrimination, Sexual Harassment and/or retaliation with the Title IX Coordinator. All members of the faculty and administrators above a Director-level are Mandatory

Reporters. This includes: Dean, Associate Dean, Senior Director, Associate Vice President, Vice President, and President.

The initial concern of the College is for the well-being and safety of the Complainant and the community. If there is reason to believe that an assailant is at large who poses an immediate threat to the community, the Title IX Coordinator and the designated college officials will take action to protect the campus. The College will ensure that the Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. After seeing to the well-being of the individual reporting the alleged assault and to the immediate security of the campus, the College will evaluate the report.

The College does not have a time limit for reporting sexual discrimination. Reports can be submitted at any time following an incident, although the College's ability to take any action may be negatively affected by the length of time between the alleged incident and the report. Acting on notice/complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

Anonymous Reporting

Any individual may make an anonymous report concerning an act of sexual discrimination or Sexual Harassment (including Sexual Violence). An individual may report the incident without disclosing their name, identifying the Respondent, or requesting any action. Depending on the extent of information available, the College's ability to respond to an anonymous report may be limited. The College provides a 24/7/365 hotline at www.peirce.ethicspoint.com or (855) 857-5885.

Timely Warnings

When an incident is reported to the College involves an alleged crime that constitutes a possible ongoing or continuing threat to the campus community, the College will evaluate each incident on a case-by-case basis to determine if a timely warning notice will be distributed to the community in a manner consistent with the requirements of the Clery Act. If a timely warning is issued to the campus community due to reported incidents that pose a substantial threat of bodily harm or danger, the College will make every effort to ensure that the Complainant's name and other identifying information is not disclosed while still providing enough information to make safety decisions in light of the danger.

Local Law Enforcement

Notwithstanding the Complainant's ability to file a complaint with Peirce College, the Complainant may also file a report with local law enforcement. The Title IX Coordinator or Deputy Coordinator will assist the Complainant in reporting the alleged offense to the local police if the Complainant requests such assistance. In addition, the importance of preserving evidence for proof of a criminal offense is conveyed to the Complainant at the time of first reporting. Although the College strongly encourages all member of its community report Sexual Violence to law enforcement, it is the Complainant's choice whether or not to make such a report. The College's response to alleged violations of this policy does not preclude the possibility of criminal action by civil authorities, should the Complainant wish to pursue this course of action.

Medical Attention/Preservation of Evidence

For your safety and well-being, immediate medical attention is encouraged. In the case of rape or sexual assault, getting immediate medical attention is crucial so you can be evaluated for physical injuries, sexually transmitted diseases and to collect physical evidence. To keep evidence viable, do not change

clothes, bathe, shower, use the restroom or cleanse in any way prior to your examination. If you have physical injuries, have them photographed with a date stamp on the photo. Try to memorize details and record those details. Getting medical attention does not require you to report to anyone. You do not have to report the sexual assault to law enforcement; however, the medical staff can collect physical evidence should you choose to press charges later. For information about obtaining a free forensic examination, contact the Rape, Abuse & Incest National Network (RAINN) at (800) 656-HOPE.

Preserving Information

Complainants, Respondents, and witnesses should consider whether there is information to gather that might be helpful to investigator(s) and should preserve relevant items. For example, receipts, text messages, pictures, videos, emails, Facebook posts or messages, Snapchats, or other social media posts may be helpful during an investigation or hearing. It may be helpful not to delete this information and preserve it for later. Also, Complainants and Respondents are encouraged to write down a list of possible witnesses to submit to investigator(s).

Protection from Abuse (PFA) and Sexual Violence Protection (SVPO) Orders

A Protection from Abuse Order is a civil order that provides protection from harm by family or household members, sexual or intimate partners, or someone with whom you have a child in common. A Sexual Violence Protection Order is similar to a PFA and offers civil protection to any victim of sexual violence who is a risk of harm from their perpetrator. PFA's and SVPO's are issued by a judge. Peirce College will honor any official PFA's or SVPO's issued. Copies of such orders should be given to the Dean, Academic Advising and Registrar (students) or the AVP, HR and Chief D&I Officer (employees).

Community Resources: Counseling, Mental Health, and Related Services

Peirce College does not currently offer on campus counseling or mental health services for victims of sexual violence and other sexual offenses, however, there are a number of off campus educational, counseling, and mental health services available, and students are encouraged to utilize these resources, which include:

Philadelphia Special Victims Unit	300 E. Hunting Park Ave Philadelphia, PA 19124	(215) 387-9500	Provides initial emergency medical treatment and crisis counseling services for sexual assault victims
Family Based Services – Sexual Abuse	1315 Windrim Avenue Philadelphia, PA 19141	(215) 456-2626	Provides intensive individual, family, and group sexual abuse therapy with on-call crisis response
Rape, Abuse & Incest National Network		(800) 656-HOPE www.rainn.org	RAINN operates the National Sexual Assault Hotline and carries out programs to prevent sexual assault
Sexual Assault Center-Jefferson Hospital Emergency Room	10 th and Sansom Street Philadelphia, PA 19107	(215) 955-6840	Provides medical care for injuries, documentation and evidence collection for legal purposes, prevention and treatment.
New Jersey Coalition Against Sexual Assault	2233 Whitehorse Mercerville Rd., Suite J Trenton, NJ 08609	(800) 601-7200 24-hour hotline	Provides confidential, hotline, crisis counseling, referral services and emergency client support.
Woman Organized Against Rape (WOAR)	One Penn Center 1617 JFK Blvd., Ste 1100 Philadelphia, PA 19103	(215) 985-3333 24-hour hotline	Counseling, hotline and information about sexual violence and emergency client support.

Wellness: Peirce College offers a free mental health/counseling service to enrolled students via UWILL. Students can choose video, phone, or messaging as a means of meeting with a counselor. Students can access the UWILL portal from here: https://my.peirce.edu/ICS/Campus_Life/. For more information, contact the Associate Dean, Student Support Services.

Any student needing assistance in contacting any of these off campus programs or counseling services related to sexual assault and/or prevention may contact the Mary W. Walker Center '33 for Academic Excellence at 888-GO-PEIRCE, ext. 9251 or WCAE@Peirce.edu. Additional sexual assault awareness and counseling services are also listed in the Peirce College Catalogs.

College's Response

Peirce College must respond to a complaint when it has actual knowledge of sexual violence/discrimination that occurred within the College's education program or activity against a person on campus or at a college-related event. Actual knowledge is defined as notice of sexual violence/discrimination or allegations of sexual violence/discrimination to the Title IX Coordinator or any official of the College who has authority to institute corrective measures on behalf of the College. The College is in violation of Title IX if its response is clearly unreasonable in light of the known circumstances.

The Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain the process for filing a formal complaint.

Peirce College will keep confidential the identity of Complainants, Respondents, and witnesses, except as necessary to carry out a proceeding as described in this policy, or as may be permitted by FERPA, or required by law.

The College must investigate every Formal Complaint of Sexual Harassment, which may be filed by the Complainant or the Title IX Coordinator. If the alleged conduct does not fall under Title IX, the College may address the allegations under other College policies and provide supportive measures.

Complainant's Rights

Peirce College is committed to providing options, support, and assistance for all Complainants of reported campus-related sexual discrimination. We commit to:

- Provide information about the College's sexual discrimination policy;
- Treat you with respect, dignity, and sensitivity throughout the process;
- Refer you to available resources and how to access these resources, including counseling;
- Support your right to choose an advisor, which may be an attorney, for guidance through the investigation, hearing and/or appeal process;
- Inform you of the option to notify law enforcement, and the option to be assisted by campus personnel in notifying such authorities;
- Explain and implement reasonable Supportive Measures (described below)
- Support your right to be free from retaliation by the institution, the Respondent, witnesses, and/or their friends, family, and acquaintances within the jurisdiction of the College, as a result of filing a report and/or your involvement in an investigation;
- Promptly respond to any retaliation or discrimination you experience based on your involvement in this process.

Respondent's Rights

If you have been named in a complaint of sexual discrimination, Peirce College Commits to:

- Provide information about the College's sexual discrimination policy;
- Treat you with respect, dignity, and sensitivity throughout the process;
- Refer you to available resources and how to access these resources, including counseling;
- Support your right to choose an advisor, who may be an attorney, for guidance through the investigation, hearing, and/or appeal process;
- Provide written notice of the nature of the complaint filed against you;
- Explain and implement reasonable Supportive Measures (described below)
- Support your right to be free from retaliation by the institution, the Complainant, witnesses, and/or their friends, family, and acquaintances within the jurisdiction of the College, as a result of filing a report and/or your involvement in an investigation;
- Promptly respond to any retaliation or discrimination you experience based on your involvement in this process.

Fair Grievance Process

Whether through an informal or formal process, Peirce College will provide a prompt, fair and impartial investigation, and resolution to evaluate Formal Complaints of Sexual Harassment. If extenuating circumstances delays the proceedings, the College will inform both the Complainant and Respondent of the circumstances.

The Title IX personnel recognize the gravity of the complaint for both the Complainant and Respondent and have a responsibility to objectively evaluate all of the relevant evidence and avoid credibility determinations based on a person's status as a Complainant, Respondent, or witness. Title IX personnel must be free from conflicts of interest or bias for or against the parties involved in the complaint and will recuse themselves from the process if they feel unable to uphold these standards.

The formal process follows progressive steps beginning with the complaint and an investigation to gather evidence. A written report of the evidence will be provided to both Parties. If the complaint is not resolved informally or dismissed, the evidence and testimony will be presented at a live hearing to a Hearing Panel, where both Parties will have the opportunity to present evidence, witnesses, and have their advisors ask questions. Once the Hearing Panel renders a decision, both Parties have the opportunity to appeal.

Informal Resolution Process

As an alternative to the formal resolution process, both parties can voluntarily agree to an informal resolution process, through which Formal Complaints may be resolved without a live hearing, often through communication, education, and/or mutual agreement. After a Formal Complaint has been filed, both parties can voluntarily through informed written consent agree to the informal resolution process. The process is not required as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to a formal investigation and adjudication of formal complaints of sexual discrimination. At any time prior to agreeing to a resolution, any Party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the Formal Complaint.

Peirce College will not offer or facilitate an informal resolution process to resolve allegations of sexual discrimination of an employee against a student.

The goal of informal resolution is to resolve concerns at the earliest stage possible, with the cooperation

of the Parties involved. Efforts for early resolution will be flexible and encompass a full range of possible outcomes, including, but not limited to addressing the Respondent, participating in mediation (which may be ended at any time by either Party in favor of the formal process), or arranging a remedy for the Complainant and/or agreement by Respondent to accept a disciplinary sanction. The informal resolution process could include by way of example: separating the parties; referring the parties to counseling; conducting targeted educational and training programs; or providing remedies to the Complainant.

If the matter is resolved informally to the satisfaction of all parties, the Title IX Coordinator will maintain a record of the complaint and its resolution.

If informal resolution is not possible, the Formal Complaint will proceed to formal resolution of the complaint.

Role of an Advisor

The Complainant and Respondent are permitted to choose an advisor who may be present during the grievance process, including meetings, interviews, hearings, and appeals. Complainants and Respondents may have any individual of their choosing serve as an advisor, including an attorney, friend, or a family member. If a Party does not have an advisor for the live hearing, the College will provide one. A party may reject a College appointed advisor and choose their own advisor, but they may not proceed to the live hearing without an advisor. An advisor may not speak on behalf of the individual, including answering questions for them. During the hearing, the advisor – not the Complainant or Respondent – will conduct cross-examination of the Parties and witness.

Choosing an advisor who is a witness in the Grievance Process creates potential for bias and conflict of interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-Maker.

The Parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the Grievance Process. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address College officials in a meeting or interview unless invited to. An advisor may not make a presentation during any meeting or proceeding and may not speak on behalf of the party to the investigation or other Decision-Maker except during a Live Hearing, during cross-examination. If an advisor is disruptive or otherwise fails to respect the limits of the advisor role, the meeting or interview may be ended.

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by the College. The College may seek to restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by the College's privacy expectations.

Supportive Measures

The Title IX Coordinator will provide Supportive Measures as necessary. Supportive Measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. Examples include counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the Parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation. The Supportive Measures needed by the Complainant and/or Respondent may change

over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

Victims of Sexual Violence will also be provided with written notification about counseling, health and/or mental health services, victim advocacy, legal assistance, visa and immigration assistance, safety planning, timely warnings, student financial aid and other services available to victims within the College and in the community.

Once the Title IX Coordinator receives a report, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Formal Complaint) and explain the process for filing a Formal Complaint and provide a copy of this policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

The College will keep confidential the identity of the victim of Sexual Violence and any accommodations or Supportive Measures provided, to the extent that maintaining such confidentiality will not impair the College's ability to provide the accommodations or Supportive Measures.

Where the reported conduct poses a substantial and immediate threat of harm to the safety or wellbeing of an individual, members of the campus community, or the performance of normal College functions, the College may suspend a student or impose leave for an employee. Pending resolution of the complaint, the individual may be denied access to the campus and/or all other College activities or privileges for which the student/employee might otherwise be eligible, as the College determines appropriate. When interim suspension or leave is imposed, the College will make reasonable efforts to complete the investigation and resolution within an expedited timeframe.

Investigation

The College will investigate Sexual Harassment allegations in a Formal Complaint signed by a Complainant or the Title IX Coordinator. The Title IX Coordinator will respect the Complainant's wishes as to whether the College investigates an allegation of Sexual Harassment unless the Title IX Coordinator determines that not investigating would be deliberately indifferent or harmful to the College community. The College may consolidate Formal Complaints where the allegations arise out of the same facts.

In response to a Formal Complaint, the Title IX Coordinator will provide written notice of the allegations to the known parties along with a description for the grievance process with sufficient time for the Parties to prepare a response before their initial interview. The written notice will include:

1. the identity of the Parties (if known);
2. conduct alleged to be sexual discrimination;
3. the alleged incident's date and location;
4. a statement that the Respondent is presumed not responsible until a determination is made at the end of the grievance process;
5. a statement informing the Parties that each is entitled to choose an advisor; and
6. a statement informing the Parties that the College's code of conduct prohibits knowingly making false statements.

The Parties will also be provided with separate written notice of any investigative interview, meeting, or hearing. Interview/meeting notices will include the date, time, location, participants and purpose of the investigative interview or meeting.

Title IX personnel will gather evidence, interview the Complainant, Respondent, and witnesses, giving both Parties an equal opportunity to present facts and witnesses and have their advisor present at all meetings. No unauthorized audio or video recording of any kind is permitted during investigation interviews/meetings. The Parties are permitted to discuss the allegations and gather their own evidence. The College has the burden of proof, meaning the College is responsible for collecting evidence. The College is prohibited from using records made or maintained by medical or mental health professionals without the Party's voluntary, written consent.

The Parties will have two opportunities to review the evidence. The Title IX Coordinator will send the Parties and their advisors' evidence directly related to the allegations, in electronic format or hard copy, with ten (10) days to inspect, review, and respond to the evidence. Before the investigation report is complete, the Title IX Coordinator will send the Parties and their advisors an investigative report that fairly summarizes relevant evidence, in electronic format or hard copy, with at least ten (10) days for the parties to respond. Taking the Parties responses into account, the Title IX Coordinator finalizes the investigative report.

Formal Complaints involving employees will also be referred to Human Resources and simultaneously evaluated under employee conduct policies and procedures.

Formal Complaint Dismissal

The College must dismiss a Formal Complaint if the allegations do not meet the definition of Sexual Harassment, did not occur in the College's education program or activity, or did not occur against a person in the United States. The College may dismiss a Formal Complaint if: 1) the Complainant informs the Title IX Coordinator in writing that the Complainant desires to withdraw the Formal Complaint; 2) if the Respondent is no longer enrolled or employed by the College; or 3) if specific circumstances prevent the College from gathering sufficient evidence to reach a determination. In the event of a dismissal, both Parties will be provided a written notice of dismissal and the reasons for the dismissal.

Dismissal does not preclude action by the College under other Policies described in the Undergraduate College Catalog, Graduate College Catalog, and College Policies for employees located at College Policies for employees located at: https://my.peirce.edu/ics/Intranet/College_Policies (login required), including but not limited to:

STUDENTS	EMPLOYEES
Code of Student Conduct & Responsibility	Code of Ethics
Equal Opportunity	Equal Employment Opportunity
Acceptable Use of College Information Technology	Acceptable use of College Information Technology
Campus Safety & Security	Workplace Health, Safety & Security
Violation of Copyright Laws	Mandatory Child Abuse Reporting
Academic Progress, Probation and Dismissal	
Academic Honesty	

Unless otherwise dismissed or resolved, once the investigation is complete, the Formal Complaint will proceed to Live Hearing.

Live Hearing

The Complainant and the Respondent with their advisors will have an equal opportunity to participate in a

live hearing. The live hearing is facilitated by the Hearing Panel, separate from the Title IX Coordinator and investigator. The Hearing Panel is comprised of trained College personnel who must be free from conflicts of interest or bias for or against the Parties and will recuse themselves from the process if they feel unable to uphold these standards.

The Live Hearing will be conducted directly, orally, and in real time by the party's advisor and not by a party personally. The hearing will be conducted with all parties physically present, or at the College's discretion, any or all parties may appear using technology to facilitate the hearing, as long as the Hearing Panel and Parties can simultaneously see and hear the Parties and witnesses asking and responding to the questions. At the request of either party, the College will provide for the entire live hearing (including cross-examination) to occur with the Parties located in separate rooms with technology enabling the Parties to see and hear each other. The College will produce an audio or audiovisual recording of the hearing. The presiding official of the Hearing Panel cannot be the Title IX Coordinator, Deputy Coordinator(s), or the investigator(s).

The investigative report, witnesses, exculpatory and inculpatory evidence will be presented. While the Parties cannot directly question each other, their advisors can cross-examine the other Party and all witnesses with relevant questions and follow-up questions, including those challenging credibility. The presiding official will determine relevance before the question is answered and provide an explanation if any question is deemed not relevant. Questions related to a Complainant's prior sexual history are deemed not relevant, unless offered to prove someone else was responsible for the alleged conduct, or, if related to the Complainant's prior sexual behavior with the Respondent, are offered to prove consent.

A Party does not have to submit to live cross-examination. If a party or witness does not submit to cross-examination at the live hearing, the Hearing Panel shall not rely on any statement of that party or witness in reaching a determination regarding responsibility. The Hearing Panel will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.

Deliberations of the Hearing Panel will be conducted without the Parties present and without recording.

Written Determination

The Hearing Panel will issue a written determination regarding responsibility, which includes the allegations of Sexual Harassment, a description of the procedural steps taken (from Formal Complaint through the live hearing), and the findings of fact. In addition, the written determination must include conclusions of how the policy was applied to the facts and a statement with rationale detailing the result of each allegation. The determination also must list any imposed sanctions and remedies along with how to file an appeal and be delivered to the Parties simultaneously. Factual conclusions shall be based upon a preponderance of the evidence standard (e.g., more likely than not.)

Possible Disciplinary Sanctions

The purpose of disciplinary sanctions for violations of this policy is to educate students/employees about responsible behavior as members of the Peirce College community, to maintain order, and to protect the rights of others. Sanctions will be determined individually and will reflect the nature and severity of the offense. Notwithstanding Peirce College's right to impose a sanction under this Policy, students/employees may also be subject to penalties at the local, state, and federal level.

The College reserves the right in its sole discretion to apply sanctions for a violation of this Policy, including the Violence Against Women Act 2013 ("VAWA") offenses of sexual assault, domestic violence,

dating violence and stalking, that appropriately addresses the gravity and frequency of the offense. One or more sanctions may be imposed for any offense. Prior offenses are cumulative and any student/employee found in violation of the same offense or a second offense of equal or greater magnitude may be suspended/administrative leave or expelled/terminated from the College. The failure to comply with an imposed sanction, as directed, can lead to the imposition of more severe sanctions, up to and including suspension/administrative leave or expulsion/termination. The full range of sanctions, which may be imposed against a student/employee found in violation of this Sexual Discrimination Policy, are:

- Disciplinary Warning or Reprimand - a disciplinary warning or reprimand is an official written statement of censure;
- Letter of Apology to the Aggrieved Party - a student/employee may be required to write a letter of apology to the aggrieved party;
- Requirement to Seek Counseling - the student/employee shall be required to provide evidence to the Title IX Coordinator of attendance and completion of counseling by a qualified professional;
- Participation In, or Conducting, Special Workshops, Classes, or Seminars - a student/employee may be required to participate in, or to develop, and present special workshops or seminars related to a Title IX violation;
- Research Assignments - a student may be required to complete a research assignment on a topic related to the Title IX violation within a specified deadline;
- Community Service - a student/employee may be required to perform work assignments at the College or in the local community;
- Persona Non-Gratis - prohibiting entry into a specific building on campus for a specific amount of time due to interference with the community;
- Fine - a monetary sanction issued in the form of a charge;
- No Contact Order - prohibits contact between students/employees when there exists a reasonable concern that physical or psychological harm may result from such contact;
- Withholding of an Official Transcript - may be imposed upon a student who fails to fulfill sanction requirements for a violation;
- Delay in Awarding Degrees - the College reserves the right to delay the awarding of any degree.
- Hold on Registration or Re-Enrollment - may be imposed on a student who has a Title IX case pending;
- Restitution - reimbursement to compensate for personal injury, property damage, or misappropriation of College or other personal property. It may be in the form of money or services;
- Disciplinary Probation - disciplinary probation may be imposed for a specified period of time;
- Suspension/Administrative Leave – suspension/administrative leave from the College; the duration will be determined by the Hearing Panel;
- Expulsion/Termination – is the most severe sanction that the College may impose and is permanent dismissal from the College. In addition, the student is not eligible for readmission to the College, the employee is not eligible for rehire and students/employees will be permanently barred from Peirce College property and from all College-sponsored events;
- Other sanctions as deemed appropriate by the Hearing Panel.

If an appeal is not filed within five (5) business days of the written determination, the decision of the Hearing Panel will be final.

Remedies

Remedies are provided to a Complainant whenever a Respondent is found responsible. Remedies are implemented by the Title IX Coordinator and may be disciplinary and punitive. Student Remedies are

designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis and may include Supportive Measures.

Appeals Process

Both the Respondent and the Complainant have the opportunity to request an appeal of the decision and sanctions rendered by the Hearing Panel. The three grounds upon which an appeal of the decision or sanctions may be made are:

- **Material procedural error:** The Party believes a procedural error occurred, which the Party feels may change or affect the outcome of the decision. The appeal must specify the procedural provision that was violated and the impact of this violation; procedural or technical deviations will not be sufficient to sustain an appeal unless found to have denied the appealing Party a fair process.
- **New material evidence:** The Party has substantive new evidence that was not available to the investigator(s) at the time of the decision and that may change the outcome of the decision. The new evidence must have been previously unknown or unavailable to the Party and pertinent to the case. The appealing Party must provide an explanation as to why the evidence was unknown or unavailable.
- **Conflict of Interest:** The Party believes the Title IX Coordinator, Title IX Deputy Coordinator(s), investigator(s), or a member of the Hearing Panel had a conflict of interest or bias that affected the outcome.

An appeal is not an opportunity to substitute judgment for that of the Title IX personnel and Hearing Panel merely because of disagreement with the finding and/or sanction. In any request for an appeal, the burden of proof lies with the Party requesting the appeal.

The request for an appeal, including the grounds upon which the request is based, must be submitted in writing within five (5) business days following the date of the outcome to the:

- Vice President, Enrollment Management & Student Services for students; or
- Vice President, Finance & Administration for employees

All appeals must clearly cite the grounds for the appeal and the evidence supporting it. Each Party will be notified if an appeal request will be considered and be provided the opportunity to respond.

If the basis for the appeal is a procedural error, new evidence, or a conflict of interest with Title IX personnel, the Hearing Panel will determine whether a change in decision is warranted. If the basis for the appeal is a conflict of interest with a member of the Hearing Panel, the two Vice Presidents identified above will jointly review the appeal and determine if a new hearing with a different Hearing Panel is warranted.

Both parties will be notified in writing twenty (20) business days in advance of the date and time of the scheduled appeal hearing. The Hearing Panel will review the appeal, related evidence, and if appropriate, hold a live hearing. The Hearing Panel decision is final. Appeal decisions will be rendered in writing to both Parties within ten (10) business days after the conclusion of the appeal hearing.

The College will keep all records of the investigation, hearing, and appeal - regardless of the outcome - for seven years.

False Reports

The College takes the accuracy of information very seriously, as a report of prohibited conduct may have severe consequences. A good-faith complaint that results in a finding of not being responsible is not

considered a false or fabricated report of prohibited conduct. However, when a Complainant, Respondent or witness is found to have fabricated allegations or given false information with malicious intent or in bad faith, the Complainant, Respondent, or witness may be subject to disciplinary action.

Retaliation Prohibition

Peirce College prohibits retaliation against any individual who is a Party to a complaint or has participated in (or refused to participate in) reporting, investigating, or addressing allegations of sexual discrimination. Retaliation is any act or attempt to retaliate against or seek retribution from any individual or group of individuals involved in the investigation and/or resolution of a complaint under this policy. Retaliation can take many forms, including threats and intimidation, harassment, and continued abuse or violence. Actions are considered retaliatory if they have a materially adverse effect on the working or academic environment of an employee or student, or if the employee or student can no longer effectively carry out his or her responsibilities.

However, the exercise of rights protected under the First Amendment does not constitute retaliation. Retaliation includes charging an individual with code of conduct violations that do not involve sexual discrimination but arise out of the same facts and circumstances as the complaint, if those charges would interfere with any right or privilege secured by Title IX.

However, charging an individual with a code of conduct violation for making materially false statements in bad faith in the course of a sexual discrimination grievance proceeding does not constitute retaliation.

Any person who believes they have been retaliated against should contact the Title IX Coordinator.

Training

The College ensures that its Title IX personnel have adequate training. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the College's Education Program or Activity, how to conduct an investigation, the College's Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Members of the Decision Panel are trained on the definition of Sexual Harassment, the Live Hearing process, the technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process.

Materials used to train Title IX personnel are posted on the College's website:

<https://www.peirce.edu/content/pdf/compliance/DMi-Webinar-TitleIX.pdf>

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA"), the College will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students (during new student orientation) and new employees (upon hire) and generally every year thereafter.

Prevention and Awareness Programs

Peirce College is committed to providing on-campus and online educational programs to promote the prevention and awareness of sexual violence or sexual harassment including, but not limited to, domestic violence, dating violence, rape, acquaintance rape, stalking or any other form of sexual offense. Such educational programs also address risk reduction and the role of active bystanders in preventing such offenses.

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (“Clery Act”) and the Violence Against Women Reauthorization Act of 2013 (“VAWA”), educational programs include but are not limited to: information provided in new student orientation programming; awareness, risk reduction, and prevention workshops provided during Sexual Assault Awareness and Prevention month; a community awareness day; and resource materials available throughout the campus. Other educational programs are offered by the Mary W. Walker Center ’33 for Academic Excellence throughout the year as well as are available to students upon request.

In addition, literature on preventing and awareness of dating and domestic violence, risk reduction, and off campus counseling and mental health services is available through the Mary W. Walker Center ’33 for Academic Excellence. Students may also contact the Center at 888.GO.PEIRCE, ext. 9251 or at WCAE@peirce.edu.

For employees, the College will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking new employees (upon hire) and generally every year thereafter.

Risk Reduction

Risk reduction involves utilizing strategies to reduce one’s risk of sexual assault or harassment. The Rape, Abuse, & Incest National Network, www.rainn.org provides the following helpful information on its website:

Avoiding Dangerous Situations:

While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted.

- **Be aware** of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- **Try to avoid isolated areas.** It is more difficult to get help if no one is around.
- **Walk with purpose.** Even if you don’t know where you are going, act like you do.
- **Trust your instincts.** If a situation or location feels unsafe or uncomfortable, it probably isn’t the best place to be.
- **Try not to load yourself down** with packages or bags as this can make you appear more vulnerable.
- **Make sure your cell phone is with you** and charged and that you have cab money.
- **Don't allow yourself to be isolated** with someone you don’t trust or someone you don’t know.
- **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.

<https://rainn.org/get-information/sexual-assault-prevention/avoiding-dangerous-situations>

Handling Social Situations

While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations.

- **When you go to a social gathering, go with a group of friends.** Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- **Trust your instincts.** If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).

- **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
- **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
- **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
- **If you suspect you or a friend has been drugged, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).** Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).
<https://rainn.org/get-information/sexual-assault-prevention/social-situations>.

The RAINN website also has other important information on safety planning, responding to pressure and computer safety: <https://rainn.org/get-information/sexual-assault-prevention>.

Active Bystander

Active Bystanders play a critical role in the prevention of sexual violence and other sexual offenses. These are individuals who observe violence or conditions that may perpetuate violence and follow the appropriate reporting procedures, such as, calling 911, informing campus security and/or college officials. It is understandable that in many circumstances, the active bystander may be uncomfortable intervening or communicating concerns; however, conveying potential risks to individuals or the college community will help the College maintain a safe environment. As a support to employees, the Walker Center for Academic Excellence provides information on the role of active bystanders. The RAINN website also has other important information on the role bystanders can play in preventing and responding to acts of sexual violence: <https://rainn.org/get-information/sexual-assault-prevention/bystanders-can-help>

Confidentiality

The College does not currently offer confidential on-campus pastoral, counseling, or mental health services for victims of sexual violence and other offenses. However, victims/survivors are encouraged to seek off campus counseling in order to speak confidentially with a professional and begin the recovery period. A member of the College community may contact any number of local community resources for these counseling services. A list of off campus counseling, mental health, and other related services is provided within this document, **See Community Resources** (p. 15).

The College respects the rights of victim confidentiality and will honor victims' requests to keep reports confidential to the extent permitted by law, and to the extent consistent with the College's obligation to investigate allegations. Victims are encouraged to inquire about confidentiality when seeking assistance and support from the varying offices.

The College understands and appreciates that, at times, an individual who reports an act of sexual violence or other sexual offense may wish to remain anonymous and may not wish to pursue the internal disciplinary process. In such instances, consistent with its Title IX obligations, if the College has credible notice of a report of an act of sexual violence or other sexual offense against a member of the College community, the College will take immediate and appropriate steps to evaluate what occurred and determine if further action is required as well as prevent any further recurrence. Any response to such notice may be limited if the events giving rise to such notice cannot be verified by independent facts.

Under the **Clery Act**, federal and state law mandates the disclosure of certain statistics regarding sexual violence that occurs within the geographic boundaries of an institution of higher education. In accordance

with both the Clery Act, as well as the **Campus Sexual Violence Elimination Act (“SaVE Act”)** **provisions of the Violence Against Women Reauthorization Act of 2013 (“VAWA”)**, Clery Act reports do not include the names of anyone involved, or any other information that identifies an individual. In addition, consistent with applicable law, the College will take appropriate steps to protect the identity of a victim in connection with any publicly available recordkeeping.

Consistent with applicable law, in connection with issuing a Timely Warning involving an incident of sexual violence, the College will withhold the name of the victim.

Sex Offender Registration

In accordance with the Jeanne Clery Act and the Family Rights and Privacy Act of 1974, the College is required to issue information advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already obligated to register in a State to provide notice to each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. Students and employees of Peirce College seeking law enforcement agency information concerning registered sex offenders can visit www.pameganslaw.state.pa.us, an online listing established by the Pennsylvania State Police to provide timely information to the public on Sexually Violent Predators residing in the Commonwealth. Students and employees may also refer to sex offender registries for Delaware and New Jersey:

- Delaware: <https://www.registeredoffenderslist.org/delaware-sex-offenders.html>
- New Jersey: <https://www.njsp.org/sex-offender-registry/index.shtml>

Unlawful use of the information for purposes of intimidating or harassing another is prohibited. If you suspect that a child is being abused or neglected, please contact your local child protective services office or local law enforcement agency. Many States have a toll-free number to report suspected child abuse or neglect. To find out where to call, visit <https://www.childwelfare.gov/topics/responding/reporting/how/>

Peirce College Annual Crime Reporting and Disclosure

- The statistics in this report are published in compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* and the *Pennsylvania Uniform Crime Reporting Act* and *Chapter 33 of Pennsylvania Code*.
- The report is prepared by Institutional Research under direction of the Vice President, Finance and Administration and the Vice President, Academic Affairs and Provost.
- The crime statistics listed in the report include the categories of criminal homicide, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Peirce College requests crime statistics from the Philadelphia Police Department's Office of Public Affairs for the crimes reported on and around its campus.
- The College regularly reports criminal incidents to State police agencies and reports to local police agencies whenever there is an incident that requires legal authorities.
- Students and employees of the College are notified annually about the availability of the security report, published by October 1 each year. The report is available on the web at <https://www.peirce.edu/about-peirce/additional-resources/consumer-information> and the student portal at my.peirce.edu (Security tab). Current and prospective students and employees are entitled to receive a print copy of this report upon submitting a request to the Associate Dean, Student Support Services at 215-670-9251.
- In 2022, the College's urban campus consisted of two buildings located along Pine, Waverly, and South Carlisle Streets in Philadelphia, Pennsylvania, with an address of 1420 Pine Street, Philadelphia, PA 19102. In spring 2023, Peirce College relocated its main campus to 1608 Walnut Street, Suite 1900, Philadelphia, PA 19103. The College occupies the entire 19th floor of this urban high-rise.
- Per the *Clery Act* definition, there is no non-campus or residential property associated with Peirce College and, therefore, no non-campus or residential crime to be reported. Peirce does not operate any residential facilities, and does not prepare an annual housing facilities fire report or a missing student report.
- The following Public Property offenses reflect the statistics provided by the Philadelphia Police Department, 9th District, Sector 1.

To request a print copy of this document, please contact the Associate Dean, Student Support Services at 215-670-9251.

**PEIRCE COLLEGE CRIME STATISTICS
FOR FEDERAL REPORTING PURPOSES – 2020-2022**

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act

The Clery Act requires the release of statistics for certain criminal incidents, arrests, and disciplinary referrals on campus to all students and employees, and, upon request, to prospective students and employees. The law requires that these statistics be shown in specific geographic categories. Statistics are provided in compliance with the specific time periods, crime classifications, geographic categories, and arrest data mandated by federal law. Please note that these statistics use federal crime classifications, which vary from the crime classifications under state law, which are also published in this report. The statistics reported below reflect the number of incidents reported to the College's Security Services. They do not indicate actual criminal prosecution or student judicial action, or the outcome of either.

	On-Campus 1420 Pine St.			Public Property		
	20	21	22	20	21	22
Criminal Offenses						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0
Robbery	0	0	0	1	4	5
Aggravated Assault	0	0	0	0	0	2
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Hate Crimes						
Murder/Non-negligent Manslaughter	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0
Larceny/Theft	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0
VAWA Offenses						
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
Arrests and Referrals for Disciplinary Action						
Weapons Possession – Arrests	0	0	0	0	0	0
Drug Abuse Violations – Arrests	0	0	0	0	0	0
Liquor Law Violations – Arrests	0	0	0	0	0	0
Weapons Possession – Referrals	0	0	0	0	0	0
Drug Abuse Violations – Referrals	0	0	0	0	0	0
Weapons Possession – Arrests	0	0	0	0	0	0
Drug Abuse Violations – Referrals	0	0	0	0	0	0
Liquor Law Violations – Referrals	0	0	0	0	0	0

**PEIRCE COLLEGE CRIME STATISTICS
FOR PENNSYLVANIA REPORTING PURPOSES – 2020 - 2021**

The Pennsylvania Uniform Crime Reporting Act

The Pennsylvania Uniform Crime Reporting Act mandates the release of crime statistics and rates to matriculated 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 the College's Full Time Equivalent (FTE) students and employees. The FTE is calculated using a state required formula. The College's FTE Population was 992 in 2019/20; 869 in 2020/21; and 729 for 2021/22. The statistics reported below reflect the number of incidents reported to the College's Security Services. They do not indicate actual criminal prosecution or student judicial action, or the outcome of either. Please note that the state crime classifications for which the College is reporting these statistics varies from the crime classifications under federal law, which are also published in this document.

	2020		2021		2022	
Part I Offenses	ACTUAL	INDEX	ACTUAL	INDEX	ACTUAL	INDEX
Murder and Non-negligent Manslaughter	0	0.00	0	0.00	0	0.00
Manslaughter by Negligence	0	0.00	0	0.00	0	0.00
Rape	0	0.00	0	0.00	0	0.00
Attempts to Commit Forcible Rape	0	0.00	0	0.00	0	0.00
Robbery	0	0.00	0	0.00	0	0.00
Aggravated Assault	0	0.00	0	0.00	0	0.00
Burglary	0	0.00	0	0.00	0	0.00
Larceny-Theft	0	0.00	0	0.00	0	0.00
Vehicle Theft	0	0.00	0	0.00	0	0.00
Arson	0	0.00	0	0.00	0	0.00
TOTAL	0	0.00	0	0.00	0	0.00
	2020		2021		2022	
Part II Offenses	ACTUAL	INDEX	ACTUAL	INDEX	ACTUAL	INDEX
Other Assaults	0	0.00	0	0.00	0	0.00
Forgery and Counterfeiting	0	0.00	0	0.00	0	0.00
Fraud	0	0.00	0	0.00	0	0.00
Embezzlement	0	0.00	0	0.00	0	0.00
Stolen Property	0	0.00	0	0.00	0	0.00
Vandalism	0	0.00	0	0.00	0	0.00
Weapons	0	0.00	0	0.00	0	0.00
Prostitution	0	0.00	0	0.00	0	0.00
Sex Offenses	0	0.00	0	0.00	0	0.00
Drug Abuse Violations	0	0.00	0	0.00	0	0.00
Gambling	0	0.00	0	0.00	0	0.00
Offenses Against the Family and Children	0	0.00	0	0.00	0	0.00
Driving Under the Influence	0	0.00	0	0.00	0	0.00
Liquor Law	0	0.00	0	0.00	0	0.00
Drunkenness	0	0.00	0	0.00	0	0.00
Disorderly Conduct	0	0.00	0	0.00	0	0.00
Vagrancy	0	0.00	0	0.00	0	0.00
All Others	0	0.00	0	0.00	0	0.00
Suspicion	0	0.00	0	0.00	0	0.00
TOTAL	0	0.00	0	0.00	0	0.00

APPENDIX A

Responsibilities of Emergency Wardens

Primary Emergency Warden responsibilities:

- Understand the layout of the office, including exits, location of pull stations and fire extinguishers
- Identify individuals that need assistance in evacuating the building and assign an Emergency Aid to assist in the evacuation.
- Determine if the emergency action is to shelter in place or evacuate
- In the event of shelter in place, instruct individuals to take cover and stay still
- In the event of evacuation, coordinate and direct the evacuation of all individuals
- Ensure a secondary warden is positioned at the stairwells.
- During the evacuation, walk throughout the office to ensure that all individuals are aware of the evacuation and are proceeding to the stairwell

Secondary Emergency Warden responsibilities:

- In the event of shelter in place, instruct individuals to take cover and stay still
- In the event of an evacuation, position yourself at the stairwell
- Remind individuals to enter the stairwell in a single file and remain quiet so that all announcements can be heard
- Monitor the evacuation of individuals that need assistance
- Report the evacuation process to the Primary Emergency Warden

Aide responsibilities:

- Locate the assigned individual and assist them to the stairwell
- Once at the stairwell, report to the Secondary Warden that you are proceeding down the stairwell
- If a problem is encountered moving the assisted individual down the stairwell, the Aide should proceed to the nearest stairwell phone and request assistance from building management

Appendix B

Emergency Protocols for Different Types of Emergencies

Fire Emergencies

Our office is equipped with sprinklers, smoke detectors, fire alarms, and fire extinguishers. In the event of a fire in our office or anywhere else in the building, the fire alarms will activate.

Should it be necessary to evacuate the building due to a fire:

- Remain calm
- DO NOT USE ELEVATORS
- Do not evacuate until instructed to do so. Unnecessary evacuation could result in overcrowding in the stairwells, confusion and injury
- Follow the instructions of the Primary and Secondary Emergency Wardens
- Notify others in your vicinity of the need to evacuate
- Exit calmly through nearest stairwell; keep to the right side, close to the wall
- Move at least one block away from the building

Important Points to Remember:

- As smoke and heat rise, keep low to the ground or crawl when traveling through smoke. The lower air will be cooler and easier to breathe.
- If caught in smoke, take short breaths. Breathe through your nose.
- Do not break windows to vent smoke. Instead, fresh air will rush in and fuel the fire.
- Do not open hot doors. Before opening any door, touch it near the bottom, moving upward to feel if it is hot. A fire on the other side will blast through the slightest opening with tremendous force and the fumes are dangerous.
- Do not return for personal items if ordered to evacuate.

Should You Discover a Fire:

- Isolate the fire
- Evacuate the room
- Remove anyone in immediate danger and close doors; this will slow down the spread of fire
- Call the Fire Department (911); do not assume someone else has called
- Alert others and activate the fire alarm
- Notify the building property manager

Medical Emergencies

In the event of a medical emergency, administer first aid if you have the appropriate training.

- Remain calm.
- Call 911 for ambulance or rescue units and provide critical information.
- Call the building property manager at 215-732-1544. Building management will prepare the elevator to meet emergency services.
- Clear area and keep the victim comfortable until assistance arrives.

Active Shooter Response

In the event of an active shooter, quickly determine the most reasonable way to protect your life given the circumstances. Law enforcement recommends **RUN, HIDE, FIGHT**.

If possible, call 911. If you are unable to speak, leave the phone line open so the Dispatcher can listen.

Run Have an escape route. Evacuate even if others don't agree to follow. Leave belongings behind. Help others escape if possible. Follow the instructions of any police. Keep your hands visible if law enforcement are on-site. Do not attempt to move wounded people. Once safe, notify Emergency Services by calling 911.

Hide Hide out of view. Lock or barricade the door. Close windows and curtains. Silence your cell phone and other devices. Turn off any source of noise. Hide behind large items (i.e., cabinets, desks). Remain quiet and calm. Once safe, notify Emergency Services by calling 911.

Fight Attempt to disrupt and/or incapacitate the shooter by acting aggressively, throwing items, using improvised weapons, and yelling, or play dead by lying motionless on the ground. Commit to whatever actions are necessary for you to survive.

When Law Enforcement Arrives:

Law Enforcement's purpose is to stop the active shooter as soon as possible. Officers may wear regular patrol uniforms or external bulletproof vests, helmets and other tactical equipment. Officers may be armed with rifles, shotguns, handguns and may use pepper spray or tear gas to control the situation. Officers may shout commands and may push individuals to the ground for their safety.

What you should do when Law Enforcement arrives:

- Remain calm, and follow officers' instructions
- Put down any items in your hands (i.e., bags, jackets)
- Immediately raise hands and spread fingers. Keep hands visible at all times
- Avoid making quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming and/or yelling
- Do not stop to ask officers for help or direction when evacuating
- Proceed in the direction from which officers are entering the premises
- Once on the street, move away from the building as quickly as possible

Peirce College
Campus Safety Procedures