

The Christ College of Nursing and Health Sciences

2023 ANNUAL SECURITY REPORT

Introduction

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

Policy for Preparing the Annual Report

This report is prepared by the Dean of Student Affairs in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities and various other elements of the College. Each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Meghan Hollowell, c/o The Christ College 2139 Auburn Avenue, Office 120 Cincinnati, Ohio. 45219.. The College is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field, and are constantly tested and re-evaluated for their effectiveness.

General Safety and Security Policies

Campus Security Personnel & Relationship with Local Law Enforcement

The Christ Hospital Safety and Security Department is responsible for campus safety at the College.

The Christ Hospital ("TCH") Safety and Security Department is responsible for campus safety at the College.

Its personnel do not have arrest authority. The Safety and Security Department's jurisdiction covers all the College's on-campus property that lies on the Christ Hospital Health Network campus at 2139 Auburn Avenue. This includes the following property:

- Property from 2223 to 2135 Auburn Avenue apart from the Baptist Church located at 2147 Auburn Avenue, extending west and bordered by an unbroken fence and/or wall that extends to Justis Street and to Gage Street and surrounds the P3 parking garage.
- P2 parking lot and P1 parking garage (located within the Mason Street, Eleanor Place, Huntington Place and Auburn Avenue perimeters).
- P3 parking garage and driveway off Eleanor Place and 2066-2098 Eleanor Place.
- P5 parking lot located at 108-148 Huntington Place – up to and including the fence border surrounding the lot.
- The contracted portion of the first floor and parking lot at 2025 Reading Road.
- Use of the parking area at the Central Business Office (CBO), the geography will include the area within the addresses noted below:
 - 134-204 McMillan Avenue
 - 2501-2538 Highland Avenue
 - 219-237 William Howard Taft Road

While the College does not have any written agreements with local law enforcement agencies, it does maintain a working relationship with local police. Officers in the Safety and Security Department have received private police and security training. In extreme emergencies, Safety and Security will contact the Cincinnati Police Department to assist.

Criminal activity for campus geography locations in 2022 were monitored by Christ Hospital Safety and Security Department (on campus property) and the local Cincinnati Police Department, District 4 (public property). Crime statistics are obtained through Safety and Security and District 4, and the police captain of District 4 has been asked to report ongoing threats to our campus community to our Safety and Security Department immediately so timely warnings can be sent as needed.

Campus Security Authorities

The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

- Secretary, Administrative at 513-585-2401 or Leeann.Ballard@thechristcollege.edu
- TCH Safety and Security Department at 513-585-2222
- Secretary, Administrative at 513-585-2433 or Peggy.Nicholas@thechristcollege.edu
- Vice President of Strategy and Business Affairs at 513-585-0116 or Bradley.Jackson@thechristcollege.edu
- Vice President of Academic Affairs at 513-585-0941 or Connie.McFaddenChase@thechristcollege.edu
- Dean of Student Affairs at Meghan Hollowell, 513-585-4841, Meghan.Hollowell@TheChristCollege.edu

Reporting a Crime or Emergency

The College encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the College, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged even when the victim of a crime elects not to make a report or is unable to do so.

Report the incident to the Safety and Security Department by calling 513-585-2222 or in the case of an emergency you can also dial 911. It is important that the person reporting the emergency or unusual activity be able to supply as much of the following information as possible:

- What is the nature of the emergency or unusual activity? (i.e. fire, assault, auto accident, apparent heart attack, bomb threat, personal attack, theft in progress, suspicious person or vehicle, power outage, natural gas leak, burst pipe, water damage, etc.)
- Are there personal injuries? How many people are hurt?
- What is the exact location of the emergency or suspicious activity?
- Name, telephone number and position (student, employee) of the person making the report?

Students, staff, and visitors should also report situations to one of the campus security authorities identified above. Once reported, the individual may also be encouraged to report the situation to the appropriate police agency. If requested, a College staff member will assist in making the report to the police.

Confidential Reporting

The College will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the College's sexual harassment policy, when an employee who is not a confidential resource becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is strongly encouraged to report that information, including the status of the parties if known, to the Title IX Coordinator. The President and Vice Presidents are mandatory reporters and must report to the Title IX Coordinator. A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the College disciplinary system, or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the College without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps the College take appropriate steps to ensure the future safety of the victim and others. With such information, the College can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the College.

Students who report sexual harassment crimes are encouraged to contact the Title IX Coordinator, Meghan Hollowell, at Meghan.Hollowell@thechristcollege.edu or 513-585-4841. Students who report sexual harassment to the Confidential Reporters at IMPACT Student Life Assistance will be notified that IMPACT does not disclose their identity to the College, but that IMPACT will notify the College that the incident occurred. This process will help to identify problems and take steps to protect the College community. If the student wishes for the incident to be reported to the College, IMPACT will then provide the College with a Contact Name, Phone Number, and copy of the incident report for additional details.

Following an intake call or disclosure of such an incident later in the counseling process, IMPACT staff will complete a “Non-Identifying Incident Report” and send it to the Dean of Student Affairs and Title IX Coordinator.

The College encourages its pastoral and professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics.

Security of and Access to Campus Facilities

The Christ Hospital and The Christ College are private institutions and reserve the right to restrict access and movement on their grounds to staff, students, patients, visitors and others who are conducting business on site. Students and staff are issued I.D. badges. I.D. badges serve as access cards to enter College doors to identify individuals on the campus and while participating in College activities. All students, faculty and staff are to wear their badges whenever on TCC property or engaged in College activities. Persons without an identification badge visible may be asked to identify themselves and/or to properly display their badge. I.D. badges cannot be transferred to anyone else under any circumstance.

If a student or employee loses their I.D. badge, they should report it immediately to Safety and Security at x52222. Current employees needing replacement badges contact the Safety and Security office for a new badge which costs twenty (20) dollars. Current students needing replacement badges should do the following:

- Contact Jenifer (Sis) Deiters at Jenifer.Deiters@thechristcollege.edu to make an appointment for the badge to be reprinted/reissued.
 - There is a \$15 fee for the replacement badge unless the badge has been stolen, in which case, the fee will be waived if documentation such as a police report or written statement from security can be provided.
- Replacement badges will only be released to the student to whom it is issued.

Student and employee access to the College is by badge only. Students may gain entrance with their access card seven days a week from 5:00 a.m. to 11:00 p.m. Students who do not have their badge with them and visitors may be granted access into the building from 8a-4:30p by the receptionist. Employees have badge access to the College 24/7/365. Upon entering, anyone without a badge must sign in and wear an identification badge provided at the front desk. Upon exiting, they must sign out and return the identification badge. Recurrent failure to utilize and wear an identification badge may result in disciplinary action for students and employees. The College may be closed to access during extended periods over holiday breaks. These periods will be communicated to students, faculty, and staff via College email.

Security Considerations in the Maintenance of Facilities

Risk reduction involves creating an environment which is unfavorable to crime, such as well-lit pathways, egress lighting in hallways and stairwells, and environmental maintenance as well as creating a culture of awareness and caring. Variations in the above areas, such as non-working lights, are reported to the College's receptionist who notifies the Christ Hospital Maintenance Department for repair of the concern.

External areas of the College campus are maintained by The Christ Hospital Facilities Management ground crew, and a private cleaning service is used internally. Landscaping is regularly trimmed and monitored. Safety and Security officers routinely patrol campus areas.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

The College seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

Educational prevention and awareness programs are provided throughout the year. Some examples include See Through the Smoke (Drug and Alcohol Awareness and Safety) and Bystander Intervention. Additionally, the College provides information at least monthly for students and employees regarding the College's security procedures and practices. Digital messaging and e-mail blasts are sent out to students and employees with crime prevention and other safety tips. Among other things, this messaging may advise students and employees of the importance of reporting criminal activity, to whom crimes should be reported, being responsible for their own safety and the safety of others, and practices regarding timely warnings and emergency notifications.

As needed, notifications are sent regarding safety changes to building egress, shuttle, and building hours/closures. Posters, fliers, drills, and emergency messaging tests are also provided.

Monitoring Off Campus Locations of Recognized Student Organizations

The College does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense

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

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

Drug and Alcohol Policy

The Christ College (TCC) seeks to provide an environment in which students may experience intellectual, emotional, physical, social and personal growth. The development of the capacity to make informed decisions about drugs and responsible choices about the consumption of alcohol is a significant component of a student's personal growth, supported by TCC policies, resources and educational opportunities.

Alcohol use and illegal drug use is prohibited on the campus of TCC. This includes the use of prescription drugs for purposes other than prescribed and use of prescription drugs prescribed for someone else. TCC Drug and Alcohol Policies also prohibit the illegal possession, sale, manufacture, or distribution of alcohol and illegal drugs on the school's property or as part of any of the school's activities. The College enforces state underage drinking laws and federal and state drug laws. The misuse of substances that present physical or psychological hazards to individuals is also prohibited. TCC Drug and Alcohol Policies apply to all students and to student organizations that conduct activities on and off campus. See the link below for the drug and alcohol policies including health risks, rehabilitation resources, federal, state, local legal sanctions and collegiate (including financial aid) implications.

If a student is found in violation of TCC Drug and Alcohol Policies, sanctions determined by College administration could include but are not limited to written warning, parental notification, educational sanction (a required activity that engages the student in a positive learning experience), limitations on activities, restitution, probation, suspension or dismissal from the College.

The College complies with state and federal law and other applicable regulations governing alcoholic beverages and the possession, use, and sale of illegal drugs for those on The College's premises or participating in its activities.

Federal Drug Laws (updated 08.01.2023)

Denial of Federal Benefits (21 U.S.C. § 862) A federal drug conviction may result in the loss of federal benefits, including loans, grants, scholarships, contracts, and licenses, although the Department of Education has said it will no longer disqualify students from Title IV aid for a federal or state conviction for possession or sale of a controlled substance.

Forfeiture of Personal Property and Real Estate (21 U.S.C. § 853) Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation. A warrant of seizure may be issued and property seized at the time an individual is arrested on charges that may result in forfeiture.

Federal Drug Trafficking Penalties (21 U.S.C. § 841) Penalties for federal drug trafficking convictions vary according to the type and quantity of the controlled substance involved in

the transaction. Penalties for subsequent convictions are more severe. Federally-defined schedules of controlled substances are published at 21 U.S.C. 812.

In the case of a controlled substance in schedule I or schedule II, GHB (or, “liquid ecstasy”), or flunitrazepam (or, “rohypnol”), a person shall be sentenced to a term of imprisonment of not more than 20 years. If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million.

In the case of a controlled substance in schedule III, a person shall be sentenced to a term of imprisonment of not more than 10 years, and if death or serious bodily injury results, shall be sentenced to a term of imprisonment of not more than 15 years or a fine not to exceed \$500,000, or both, for a first offense.

For less than 50 kilograms of marijuana, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

In the case of a schedule IV substance, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

Persons convicted on federal charges of drug trafficking within 1,000 feet of an elementary school, secondary school, college, or university (**21 U.S.C. § 860**) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year, unless the offense involves five grams or less of marijuana.

Federal Drug Possession Penalties (21 U.S.C. § 844) Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison, a mandatory fine of no less than \$1,000, or both. Second convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

For the most recent and complete Federal Trafficking Penalties information, visit the website of the U.S. Drug Enforcement Administration at www.campusdrugprevention.gov/sites/default/files/2022-07/Federal_Trafficking_Penalties_Chart_6-23-22.pdf.

Drug and Alcohol State Laws

Category	Summary (Ohio Revised Code)
Possession of Marijuana	The use and possession of recreational marijuana is illegal. OHIO REV. CODE ANN. § 2925.11(A). Violators are guilty of a minor misdemeanor if the amount is less than 100 grams, resulting in a \$150 fine. OHIO REV. CODE ANN. § 2925.11(C)(3). Increased amounts lead to increased penalties. <i>Id.</i> Medical marijuana use is permitted under certain conditions. OHIO REV. CODE ANN. §§ 3796.01-3796.30.
Controlled Substances	Ohio has a wide range of laws governing controlled substances and their possession and distribution. OHIO REV. CODE ANN. §§ 2925.01-

Category	Summary (Ohio Revised Code)
	<p>2925.58. Penalties vary widely based on the amount and type of substance used. Under Ohio law, no person shall knowingly obtain, possess, or use a controlled substance. OHIO REV. CODE ANN. § 2925.11. Possession of certain drugs, like cocaine, LSD, and heroin, results in a charge of aggravated possession of drugs, a fifth-degree felony. <i>Id.</i></p> <p>Selling or offering to sell a controlled substance is illegal. OHIO REV. CODE ANN. § 2925.03. Doing so results in an aggravated felony (unless the substance is marijuana), subject to prison time and fines. OHIO REV. CODE ANN. §§ 2925.11, 2929.12.</p> <p>As an example, if a person is found guilty of possession of 12 grams of opium, they are guilty of a third-degree felony, facing 9–36 months in prison and a possible \$10,000 fine.</p>
Alcohol and Minors	<p>No person under the age of 21 shall purchase beer or intoxicating liquor. OHIO REV. CODE ANN. § 4301.63. Doing so can result in a fine between \$25–\$100. OHIO REV. CODE ANN. § 4301.99. Providing false information concerning one’s name, age, or other identification for the purpose of obtaining alcohol is a misdemeanor. OHIO REV. CODE ANN. §§ 4301.634; 4301.99. Selling beer or intoxicating liquor to a minor is also a misdemeanor and can result in a fine between \$500–\$1000 and imprisonment up to 60 days. OHIO REV. CODE ANN. §§ 4301.22; 4301.99.</p>
Driving Under the Influence (DUI)	<p>No person shall operate a vehicle under the influence of alcohol with a blood-alcohol concentration of .08 percent or more. OHIO REV. CODE ANN. § 4511.19. Operating under the influence results in a mandatory prison term of at least 3 days as well as the possibility of an intervention program. OHIO REV. CODE ANN. § 4511.19(G)(1)(a)(i).</p>

Drug and Alcohol Abuse Prevention Program

The College has a drug abuse and prevention program and conducts a biennial review of this program to evaluate its effectiveness. The College’s drug and alcohol policies can be located on the College’s Public Policy Portal:

<https://secure.compliancebridge.com/thechristcollege/public/index.php?fuseaction=print.preview&docID=1939>

College resources that support informed and responsible decisions regarding the use of drugs and alcohol include but are not limited to IMPACT Student Life Assistance and centralized Advising. IMPACT is a free and confidential counseling service available to help students manage personal and academic stressors and demands. All IMPACT counselors are masters and doctoral level professionals, qualified to help steer students toward healthy decision-making skills, daily living resources and referral assistance. IMPACT provides students and their household members and dependents with access to 24/7 in-the-moment support, and up to three face-to-face counseling sessions per issue. All TCC students are also assigned an Advising Coach within the Student Success Department. Coaches are in consistent communication with students and can provide information about relevant resources like IMPACT, as needed. Importantly, College faculty and staff members too are educated about IMPACT Student Life Assistance. Advising Coaches and faculty/staff are provided with

IMPACT business cards that can be used to easily refer students who might benefit from the resource. Finally, the TCC drug and alcohol policies identify for students several local rehabilitation resources for students with a chemical dependency, including the Center for Chemical Addictions Treatment, Alcohol Anonymous Cincinnati, and the Alcoholism Council of the Cincinnati Area. A description of the services offered by these resources and the resource's website address are provided.

In addition to the resources that are available for students in need of guidance regarding responsible drug use and alcohol consumption, educational opportunities designed to influence responsible decision making are also provided. Self-paced training programs are offered each year to directly address responsible drug use and alcohol consumption and related resources with students. This program's goals are for the participant to describe key components of TCC AOD policies, identify two effects of AOD misuse, identify three resources to help with AOD problems, and identify three legal sanctions for AOD violations. Another, related program explores how alcohol use can lead to a higher risk of being a victim of a crime. Students are expected to complete these trainings upon initial enrollment and annually thereafter. When registering, students must indicate that they have completed the training in order to proceed with course enrollment. Courses like FS 102 (Foundations of Success) additionally address stress management and mental and physical wellness, orienting students with the resources previously mentioned. Alcohol and other drug brochures and digital signage are available in multiple locations around the campus.

Employees of the College are also subject to policies related to alcohol and drugs, and these policies are available through The Christ Hospital's Compliance Bridge policy portal at [The Christ Hospital Health Network Public Portal \(compliancebridge.com\)](https://secure2.compliancebridge.com/thechristcollege/public/index.php?fuseaction=print.preview&docID=2060). These policies prohibit the use, possession, manufacture, or sale of controlled/illegal drug or alcohol while on duty, while on campus, or as any part of the College's programs and activities. Violations of these policies may result in disciplinary action up to and including termination of employment. Internally, employees have the Employee Assistance Program (EAP) available for treatment and support.

Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Consistent with applicable laws, the College prohibits dating violence, domestic violence, sexual assault, and stalking. The College's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Sexual Harassment Policy:
<https://secure2.compliancebridge.com/thechristcollege/public/index.php?fuseaction=print.preview&docID=2060>
- Non-Discrimination Statement:
<https://secure2.compliancebridge.com/thechristcollege/public/index.php?fuseaction=print.preview&docID=2043>

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

and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

Primary Prevention and Awareness Program:

The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

Crime Type (Ohio Revised Code)	Definitions
Dating Violence	The institution has determined, based on good-faith research, that Ohio law does not define the term dating violence.
Domestic Violence (Ohio Rev. Code § 2919.25)	<p>A person is guilty of domestic violence if violating any of the following provisions: (A) No person shall knowingly cause or attempt to cause physical harm to a family or household member; (B) No person shall recklessly cause serious physical harm to a family or household member; (C) No person, by threat of force, shall knowingly cause a family or household member to believe that the offender will cause imminent physical harm to the family or household member.</p> <p>“Family or household member” means any of the following: (a) Any of the following who is residing or has resided with the offender: (i) A spouse, a person living as a spouse, or a former spouse of the offender; (ii) A parent, a foster parent, or a child of the offender, or another person related by consanguinity or affinity to the offender; (iii) A parent or a child of a spouse, person living as a spouse, or former spouse of the offender, or another person related by consanguinity or affinity to a person, living as a spouse, or former spouse of the offender; (b) The nature parent of any child of whom the offender is the other natural parent or is the putative other natural parent.</p>
Stalking (Ohio Rev. Code § 2903.211(A))	The following constitutes “menacing by stalking” under Ohio law: (1) No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person. In addition to any other basis for the other person's belief that the offender will cause physical harm to the other person or the other person's family or household member or mental distress to the other person or the other person's family or household member, the other person's belief or mental distress may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs; (2) No person, through the use of any form of written communication or any electronic method of remotely transferring

Crime Type (Ohio Revised Code)	Definitions
	<p>information, including, but not limited to, any computer, computer network, computer program, r-computer system, or telecommunication device shall post a message or use any intentionally written or verbal graphic gesture with purpose to do either of the following: (a) Violate division (A)(1) of this section; (b) Urge or incite another to commit a violation of division (A)(1) of this section; (3) No person, with a sexual motivation, shall violate division (A)(1) or (2) of this section.</p>
Sexual Assault	<p>The institution has determined, based on good-faith research, that Ohio law does not define the term sexual assault.</p>
Rape, Fondling, Incest, Statutory Rape	<p>For purposes of the Clery Act, the term “sexual assault” includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Ohio law are as follows:</p> <ul style="list-style-type: none"> • Rape (Ohio Rev. Code Ann. §2907.02): <ul style="list-style-type: none"> ○ No person shall engage in sexual conduct with another who is not the spouse of the offender or who is the spouse of the offender but is living separate and apart from the offender, when any of the following applies: <ul style="list-style-type: none"> ▪ (a) For the purpose of preventing resistance, the offender substantially impairs the other person's judgment or control by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception; ▪ (b) The other person is less than thirteen years of age, whether or not the offender knows the age of the other person; ▪ c) The other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age. ○ No person shall engage in sexual conduct with another when the offender purposely compels the other person to submit by force or threat of force. • Fondling: The institution has determined, based on good-faith research, that Ohio law does not define the term fondling. • Incest: The institution has determined, based on good-faith research, that Ohio law does not define the term incest. • Statutory Rape: The institution has determined, based on good-faith research, that Ohio law does not define the term statutory rape.

Crime Type (Ohio Revised Code)	Definitions
Other "sexual assault" crimes	<p>Other crimes under Ohio law that may be classified as a “sexual assault“ include the following:</p> <ul style="list-style-type: none"> • Sexual Battery (Ohio Rev. Code Ann. § 2907.03): No person shall engage in sexual conduct with another, not the spouse of the offender, when any of the following apply: (1) The offender knowingly coerces the other person to submit by any means that would prevent resistance by a person of ordinary resolution; (2) The offender knows that the other person's ability to appraise the nature of or control the other person's own conduct is substantially impaired; (3) The offender knows that the other person submits because the other person is unaware that the act is being committed; (4) The offender knows that the other person submits because the other person mistakenly identifies the offender as the other person's spouse; (5) The offender is the other person's natural or adoptive parent, or a stepparent, or guardian, custodian, or person in loco parentis of the other person; (6) The other person is in custody of law or a patient in a hospital or other institution, and the offender has supervisory or disciplinary authority over the other person; (7) The offender is a teacher, administrator, coach, or other person in authority employed by or serving in a school for which the state board of education prescribes minimum standards pursuant to division (D) of section 3301.07 of the Revised Code, the other person is enrolled in or attends that school, and the offender is not enrolled in and does not attend that school; (8) The other person is a minor, the offender is a teacher, administrator, coach, or other person in authority employed by or serving in an institution of higher education, and the other person is enrolled in or attends that institution; (9) The other person is a minor, and the offender is the other person's athletic or other type of coach, is the other person's instructor, is the leader of a scouting troop of which the other person is a member, or is a person with temporary or occasional disciplinary control over the other person; (10) The offender is a mental health professional, the other person is a mental health client or patient of the offender, and the offender induces the other person to submit by falsely representing to the other person that the sexual conduct is necessary for mental health treatment purposes; (11) The other person is confined in a detention facility, and the offender is an employee of that detention facility; (12) The other person is a minor, the offender is a cleric, and the other person is a member of, or attends, the church or congregation served by the cleric; or (13) The other person is a minor, the offender is a peace officer, and the offender is more than two years older than the other person. • Unlawful Sexual Conduct with Minor (Ohio Rev. Code Ann. § 2907.04): No person who is eighteen years of age or older shall engage in sexual conduct with another, who is not the spouse of the

Crime Type (Ohio Revised Code)	Definitions
	<p>offender, when the offender knows the other person is thirteen years of age or older but less than sixteen years of age, or the offender is reckless in that regard.</p> <ul style="list-style-type: none"> • Gross Sexual Imposition (Ohio Rev. Code Ann. § 2907.05): <ul style="list-style-type: none"> ○ No person shall have sexual contact with another, not the spouse of the offender; cause another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies: (1) The offender purposely compels the other person, or one of the other persons, to submit by force or threat of force; (2) For the purpose of preventing resistance, the offender substantially impairs the judgment or control of the other person or of one of the other persons by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception; (3) The offender knows that the judgment or control of the other person or of one of the other persons is substantially impaired as a result of the influence of any drug or intoxicant administered to the other person with the other person's consent for the purpose of any kind of medical or dental examination, treatment, or surgery; (4) The other person, or one of the other persons, is less than thirteen years of age, whether or not the offender knows the age of that person; (5) The ability of the other person to resist or consent or the ability of one of the other persons to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the ability to resist or consent of the other person or of one of the other persons is substantially impaired because of a mental or physical condition or because of advanced age. ○ No person shall knowingly touch the genitalia of another, when the touching is not through clothing, the other person is less than twelve years of age, whether or not the offender knows the age of that person, and the touching is done with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person. • Sexual Imposition (Ohio Rev. Code Ann. § 2907.06):No person shall have sexual contact with another, not the spouse of the offender; cause another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies: (1) The offender knows that the sexual contact is offensive to the other person, or one of the other persons, or is reckless in that regard; (2) The offender knows that the other person's, or one of the other person's, ability to appraise the nature of or control the

Crime Type (Ohio Revised Code)	Definitions
	<p>offender's or touching person's conduct is substantially impaired; (3) The offender knows that the other person, or one of the other persons, submits because of being unaware of the sexual contact; (4) The other person, or one of the other persons, is thirteen years of age or older but less than sixteen years of age, whether or not the offender knows the age of such person, and the offender is at least eighteen years of age and four or more years older than such other person; (5) The offender is a mental health professional, the other person or one of the other persons is a mental health client or patient of the offender, and the offender induces the other person who is the client or patient to submit by falsely representing to the other person who is the client or patient that the sexual contact is necessary for mental health treatment purposes.</p>
Consent (as it relates to sexual activity)	The institution has determined, based on good-faith research, that Ohio law does not define the term consent (as it relates to sexual activity).

College Definition of Consent

The College uses the following definition of consent for the purpose of determining whether a violation of its Sexual Harassment Policy occurred:

Consent refers to words or actions that a reasonable person in the perspective of the Respondent would understand as agreement to engage in the sexual conduct at issue. Consent is informed, freely given, and mutually understood. Consent requires an affirmative act or statement by each participant. Consent is not passive. A person who is Incapacitated is not capable of giving Consent. Lack of consent is a critical factor in determining whether sexual harassment has occurred.

- If coercion, intimidation, threats, and/or physical force are used, there is no consent; a person’s lack of verbal resistance or submission resulting from the use or threat of force does not constitute consent.
- If a person is mentally or physically incapacitated or impaired by alcohol or drugs such that the person cannot understand the fact, nature, or extent of the sexual situation, there is no consent.
- Warning signs of when a person may be incapacitated due to drug and/or alcohol use include: slurred speech, falling down, passing out, and/or vomiting.
- If a person is asleep or unconscious, there is no consent.
- A person who is under the statutory age of consent in the applicable jurisdiction cannot provide consent to sexual activity.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity.
- Consent to past sexual activity does not imply consent to future sexual activity.
- Dressing in a certain manner does not constitute consent.
- Consent to sexual activity with one person does not constitute consent to engage in sexual activity with another.

- Consent can be withdrawn. A person who initially consents to sexual activity is deemed not to have consented to any sexual activity that occurs after he or she withdraws consent.
- Being in a romantic relationship with someone does not imply consent to any form of sexual activity.
- Effective consent may not exist when there is a disparity in power between the parties (e.g., faculty/student, supervisor/employee).

Coercion

When direct or implied force or intimidation is used to persuade a reasonable person of ordinary susceptibility to perform an act which otherwise would not have been performed or acquiesce in an act to which one would otherwise not have submitted. This includes physical, emotional, psychological, social, or other threat. This also applies when a person is incapacitated. This behavior is prohibited. Coercion can include unreasonable and sustained pressure for sexual activity. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. A person's words or conduct cannot amount to Coercion for purposes of this policy unless they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity.

Incapacitation

The state of being impaired or in a physical or mental state where the person lacks the ability to knowingly and deliberately make a choice including due to the effect of drugs or alcohol, medical condition or disability, or due to a state of unconsciousness or asleep. A person who is asleep, unconscious, or involuntarily restrained is incapacitated and cannot give effective consent. Indicators of incapacitation include, but are not limited to:

- outrageous/unusual behavior;
- inability or diminished ability to accurately discern one's environment (who, what, where, when and/or how); slurred speech; vomiting; severe intoxication;
- loss of voluntary motor skills;
- loss of involuntary motor skills;
- disjointed speech patterns (unable to follow a conversation or verbalize complete thoughts);
- and/or sleepiness that demonstrates an inability to control one's ability to stay awake.

Because incapacitation may be difficult to discern, the person seeking the sexual behavior is strongly encouraged to err on the side of caution, i.e., when in doubt, assume the other person is incapacitated and therefore unable to give effective consent.

Risk Reduction

- Travel with another person or in groups that you trust. Go with a friend, group or use the Safety and Security department escort service.
- Seek information from any of the resources listed below to increase your awareness of safe actions.
- Don't prop open exterior doors. You could be letting in an intruder. The doors are locked for your safety.
- Know the location of phones, staff offices or other safe locations.
- Report suspicious person or activity to Safety and Security.

- Be alert and aware of people around you.
- Use public walkways. Avoid shortcuts, as well as dark or secluded places.
- Always lock your car and take your keys with you.
- Inquire into the purpose of people wandering the building without a student, employee or visitor badge. Your attention will be appreciated if the person is legitimate and will discourage others if this is not the case.
- If you are a victim, call Safety and Security immediately. They can assist you and advise you of your legal rights.
- Notify the Dean of Student Affairs and Title IX Coordinator of your concerns.

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible about your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don’t make assumptions about the other person’s consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you their intentions.
- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don’t be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include:

- Extreme jealousy or insecurity
- Consistent verbal put-downs
- Isolating you from family or friends
- Making false accusations
- Mood swings
- Physically hurting you in any way
- Possessiveness
- Pressuring or forcing you to have sex
- Telling you what to do
- Checking your phone or email without permission

Bystander Intervention

Bystander intervention is a social phenomenon where individuals offer help to a victim. A caring environment increases bystander intervention. Caring is one of the four core values of TCC. The College believes that educating the campus community about how to offer help, resources available, and examining difficult topics and beliefs about crimes, victim, and ethical responses will improve bystander response, foster healthy relationships, and promote healthy behavior and safe social norms. Individuals are encouraged to:

- Intervene when it is safe to do so. If you see someone who looks like they are in trouble, ask if they need help.
- Watch out for friends and others – be aware of signs of abuse behaviors. Abuse is about power and control. Relationships exist on a broad continuum and it can be difficult to recognize when abuse becomes violence.
- If suspicious behavior is noted, call 911 if needed
- Divert those at risk away from harm. Confront people who try to seclude or take advantage of those who are incapacitated.
- Call attention to concerning behaviors – discuss your concerns with the person at risk and others that might be able to intervene.
- Believe someone who tells you that they have experienced sexual assault, abuse or stalking.
- Refer people to on or off campus support and resources listed in the Annual Security Report.

Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

Ongoing Prevention and Awareness Campaign:

The College also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP, but is intended to increase the understanding of students and employees on these

topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

PPAP and OPAC Programming Methods:

- Safety and Wellness Training has two components and is completed as part of enrollment steps for students when entering the College and annually thereafter. Part one of the training covers general compliance issues (including alcohol and drug use) and the second component focuses on sexual misconduct introduction, sexual violence and consent, sexual violence in relationships, reporting sexual violence and the complaint resolution process.
- Informational pamphlets are posted on each floor of the College in student-active areas. Pamphlets include information on Domestic Violence, Drug Abuse and Effects, and Alcohol Use and Your Health.
- Digital signage are presented throughout the year on topics like bystander intervention, warning signs of abuse, safe drug and alcohol use tips, and safety tips on preventing potential attacks. Help cards from the College's community partner, Women Helping Women, are available throughout campus buildings.
- A Q&A Table is available at orientation events ("Welcome Week") that occur onsite to provide information about safety initiatives at the College and answer questions related to safety, accessibility, programming, etc. Information on Title IX and Women Helping Women is provided.
- Annual TCC Safety and Wellness Employee Training includes four parts covering the following topics: Employee Student Success and Support Training, Employee Issues Training, Employee Emergency and Risk Management, and Employee Discrimination, Harassment, and Sexual Misconduct Training.

Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:

If you are a victim of dating violence, domestic violence, sexual assault, or stalking, go to a safe place and call 911 or the Campus Security Department at 513-585-2222.

To make a report of Sexual Harassment:

- Notification to the College may be given in any of the following ways: in person, by mail, by telephone, fax (this may delay the receipt of the report and jeopardize confidentiality), by electronic mail, using the information listed for the Title IX Coordinator, or by notifying the personnel listed below which will result in the Title IX Coordinator receiving the person's verbal or written report. Anonymous reports or information received by the Title IX Coordinator or those identified below would constitute actual knowledge and trigger the College's response.
- The persons in the following positions may be notified of the Sexual Harassment:
 - Title IX Coordinator(s)
 - Meghan Hollowell, Dean of Student Affairs and Title IX Coordinator: 513-585-4841, Meghan.Hollowell@thechristcollege.edu, Office: 120 c/o The Christ College, 2139 Auburn Avenue, Cincinnati, OH, 45219.

- Reports can be made at any time 24/7/365 by using the telephone number or electronic mail address, or by mail to the office address listed for the Title IX Coordinator. There may be a reasonable delay in response if a report is made when the College is closed or in certain other circumstances.

For confidential reporting, the following resources are recommended:

- Students: IMPACT Student Life Assistance, 24/7/365 at (866) 780-0855.
- Employees: Employee Assistance Program (LifeMatters) 24/7/365 at 1-800-634-6433.
- All: Counselors at Women Helping Women (WHW) are off-site 24/7 confidential sources and WHW is available at 513-381-5610.

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash, or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at The Christ Hospital Health Network 2139 Auburn Avenue Cincinnati OH, 45219, 585-2000.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

Security/Law Enforcement & How to Make a Police Report

- The Christ Hospital Safety and Security Department 513-585-2222
- Cincinnati Police 4150 Reading Road Avondale, OH 45229 513-569-8600

- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim's ability.

Information about Legal Protection Orders

- In Ohio, there are different kinds of protection orders available to victims, including but not limited to Domestic Violence Civil Protection Orders (DVCPO) and Civil Stalking Protection Orders (CSPO). Courts can issue ex parte (temporary) orders and orders for longer lengths of time. Ex parte orders are typically put in place until a hearing before a judge occurs. A victim should be prepared to present documentation and/or other forms of evidence when filing for an order of protection. When a protection order is granted, it is enforceable statewide. If you have obtained an order and need it to be enforced in this area you should contact Cincinnati Police Department (CPD).
- A DVCPO can be filed for in a Domestic Relations Court. Forms and a description of processes can be found by [clicking here](#).
- A CSPO can be filed for in a Common Pleas Court. Forms and a description of processes can be found by [clicking here](#).
- Any student or employee who has a restraining order, order of protection, no contact order or any other such order issued by a court against another individual (whether or not that individual is also a student or employee of the institution) is highly encouraged to notify the Safety and Security Department and/or the Title IX Coordinator of the threat and to provide a copy of the order so that it is kept on file with the Safety and Security Department and can be enforced on campus, if necessary.
- "No Trespass" Warnings: If information is available leading to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community, the College may issue a No Trespass Warning. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

Available Victim Services:

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the College and in the surrounding community. Those services include:

- Students in need of personal counseling services for non-academic matters should contact IMPACT Student Assistance Program. This is a resource to help students manage emotional and academic stress and the demands with balancing school, work, daily living, family, and relationship concerns. All IMPACT counselors are qualified masters/doctoral level professionals. These services are confidential, complimentary, professional support and guidance. Access to the program is available 24/7 at (866) 780-0855. Up to three face-to-face coaching/counseling sessions are available per issue and include daily living resource and referral assistance. Eligibility includes household members, dependents in/away from home and parents/parent-in-laws. Legal, financial, and identity theft recovery assistance is included.

- Employees may contact the Employee Assistance Program (LifeMatters) at 1-800-634-6433. This plan is free for employees and their eligible dependents. It covers 24/7 counseling, financial and legal consultations, and online and assisted searches for child and elder care resources and more. For more information, check out LifeMatters online at this link:
<https://members2.mylifematters.com/portal/landing>.
- Counselors at Women Helping Women (WHW) are off-site 24/7 confidential sources and WHW is available at (513)381-5610.
- Students and employees may also contact the Department of Pastoral Services of The Christ Hospital. The chaplains in the department are ministers who are qualified through their training and experience to offer spiritual care to all people in The Christ Hospital and College of Nursing and Health Sciences. Their sensitivity to individual beliefs and knowledge of different religious practices enable these chaplains to meet people at the point of their need. Offices of the Department of Pastoral Services are located on the first floor of the Hospital, near the lobby, and are open weekdays from 8:30 AM – 5:00 PM. A chaplain is on call 24 hours a day, and a Hospital associate can aid you in reaching a chaplain at any time by calling (513) 585-2000.
- Students and employees are strongly encouraged to reach out to a College Administrator, the Director of Financial Aid, Registrar, or their advisor. Each of these individuals will be able to listen to the student's concerns and direct them to the appropriate area for support.
- Sometimes victims of serious crimes feel the need to take a leave of absence from school. If this is being considered, be aware that financial aid may be affected. If you have questions about financial aid implications in such circumstances, contact the Director of Financial Aid at Timothy.Ring@thechristcollege.edu or 513-585-2402. The Title IX Coordinator can help facilitate this conversation as well.
- Women Helping Women, <http://www.womenhelpingwomen.org/>, 513-381-5610
- Women's Crisis Center, <https://www.wccky.org/>, Covington, 859-491-3335, Florence, KY, 859-525-2600
- Indiana Coalition Against Domestic Violence, <http://www.icadvinc.org/>, 800-332-7385
- Ohio Domestic Violence Network, <http://www.odvn.org/>, 800-934-9840
- YWCA Domestic Violence Hotline, http://www.ywcacincinnati.org/site/c.biINIZNKKjK0F/b.9357823/k.5236/Domestic_Violence_Shelters_Transitional_Living_Program.htm, 513-872-9259
- Ohio Victims of Crime, <http://victimsofcrime.org/help-for-crime-victims>, 877-584-2846
- Talbert House Victims Service Center, <http://www.talberthouse.org/>, 513-241-4484
- National Domestic Violence Hotline, <http://www.thehotline.org/>, 1-800-799-7233
- National Sexual Assault Hotline, <https://www.rainn.org/>, 1-800-656-4673
- Sexual Assault Exam – you can go to any UC Hospital Emergency Department or St. Elizabeth Hospital Emergency Department
- Greater Cincinnati Behavioral Health Services, <https://www.gcbhs.com/>
- Central Clinic: Expert Mental Health Solutions, http://www.centralclinic.org/?page_id=140, 513-558-8888
- Ohio Legal Services, http://www.ohiolegalservices.org/public/legal_problem, 1-866-529-6446 (1.800.LAW.OHIO)
- Legal Aid Society of Greater Cincinnati, <http://www.lascinti.org/>, 513-241-9400

- Immigration Advocates Network:
<http://www.immigrationadvocates.org/nonprofit/legaldirectory/search?state=OH>
- U.S. Citizenship and Immigration Services: <http://www.uscis.gov/about-us/find-uscis-office/field-offices/ohio>, 1-800-375-5283

Accommodations and Protective Measures:

The College will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the College is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Requests for accommodations or protective measures should be made to the Dean of Student Affairs and Title IX Coordinator at Meghan.Hollowell@thechristcollege.edu or 513-585-4841. The Title IX Coordinator is responsible for deciding what, if any, accommodations or protective measures will be implemented.

When determining the reasonableness of such a request, the College may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.
- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The College will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the College's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, the College will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

Procedures for Disciplinary Action:

An allegation of domestic violence, dating violence, sexual assault, or stalking will be processed through the Sexual Harassment Policy and related procedures if it meets the criteria necessary for such processing. An allegation that does not meet those criteria may be processed through the Code of Conduct or other personnel or student policy to which it applies. The appropriate procedures are utilized whenever or wherever a complaint is made, regardless of the status of the complainant and the respondent.

- The complaint resolutions procedures are invoked once a report is made to the following individual:
 - Title IX Coordinator(s)
 - Meghan Hollowell, Dean of Student Affairs and Title IX Coordinator, 513-585-4841, Meghan.Hollowell@theChristCollege.edu, Office: 120 c/o The Christ College, 2139 Auburn Avenue, Cincinnati, OH, 45219.

Reports can be made at any time 24/7/365 by using the telephone number or electronic mail address, or by mail to the office address listed for the Title IX Coordinator. There may be a reasonable delay in response if a report is made when the College is closed or in certain other circumstances.

Reports of domestic violence, dating violence, sexual assault, or stalking will prompt a response of support for the party(ies) involved. If the complainant decided to seek resolution, a formal complaint must be filed. A preliminary assessment will be conducted to determine if the conduct, as reported, falls or could fall within the scope of the Sexual Harassment policy or if it constitutes or could constitute Sexual Harassment. If the complainant meets the assessment noted, then within five (5) days of the Title IX Coordinator receiving a Formal Complaint that meets the preliminary assessment, the Title IX Coordinator will transmit a written notice to the Complainant and Respondent. Two resolution processes are then possible: informal or formal. If the complaint does not meet the criteria under the Sexual Harassment policy, it may be closed or referred to other College offices, as appropriate.

- Either party may terminate the informal process at any time and elevate the complaint to the formal investigation procedures described below.
- An informal resolution process is not available when one party is a student and the other party is an employee of the College.

The specific manner of any informal resolution process will be determined by the parties and the Title IX Coordinator, in consultation together. Prior to commencing the informal resolution process agreed upon, the Title IX Coordinator will transmit a written notice to the parties describing the process, identifying the individual responsible for facilitating the informal resolution, explaining the effect of participating in informal resolution and/or reaching a final resolution will have on a party's ability to resume the investigation and adjudication of the allegations at issue in the Formal Complaint; and explaining any other consequence resulting from participation in the informal resolution process, including a description of records that will be generated, maintained, and/or shared. After receiving the written notice specified in this paragraph, each party must voluntarily provide written consent to the Title IX Coordinator before the informal resolution may commence.

If the parties reach a resolution through the informal resolution process, and the Title IX Coordinator agrees that the resolution is not clearly unreasonable, the Title IX Coordinator will reduce the terms of the agreed resolution to writing and present the resolution to the parties for their written signature. Once both parties and the Title IX Coordinator sign the resolution, the resolution is final, and the allegations addressed by the resolution are considered resolved and will not be subject to further investigation, adjudication, remediation, or discipline by the College, except as otherwise provided in the resolution itself, absent a showing that a party induced the resolution by fraud, misrepresentation, or other misconduct or where required to avoid a manifest injustice to either party or to the

College.

A party may withdraw their consent to participate in informal resolution at any time before a resolution has been finalized. If the resolution is not acceptable to both parties, the default is either that a formal complaint is instituted, investigated, and adjudicated, or the complaint is withdrawn. The facilitator of the informal resolution process may be a witness at the formal resolution process. Absent extension by the Title IX Coordinator, any informal resolution process must be completed within twenty-one (21) days. If an informal resolution process does not result in a resolution within twenty-one (21) days, absent an extension, abeyance, or other contrary ruling by the Title IX Coordinator, the informal resolution process will be deemed terminated, and the Formal Complaint will be resolved pursuant to the investigation and adjudication procedures. The Title IX Coordinator may adjust any time periods or deadlines in the investigation and/or adjudication process that were suspended due to the informal resolution.

The formal resolution process:

Upon receipt of a formal complaint, the formal process will be initiated in a reasonably prompt manner if the parties do not wish to utilize the informal process or if the informal process is not permissible based on the nature of the complaint. Both parties will be given written notice of the allegations, an equal opportunity to select an advisor of choice, and equal opportunity to submit and present witnesses (fact and expert witnesses).

After the written notice of Formal Complaint is transmitted to the parties, an investigator selected by the Title IX Coordinator will undertake an investigation to gather evidence relevant to the allegations, including inculpatory and exculpatory evidence. The burden of gathering evidence sufficient to reach a determination in the adjudication lies with the College and not with the parties.

A trained and impartial Investigation Officer(s) will seek reasonably available facts and evidence relating to the allegations in the formal complaint within a reasonably prompt time frame. Investigators may redact information that is not directly related to the allegations or that is otherwise barred from use, such as because of legally recognized and not waived privilege.

- During the investigation, the investigator will provide an equal opportunity for the parties to be interviewed, to present witnesses (including fact and expert witnesses), and to present other inculpatory and exculpatory evidence.
- Prior to issuing a report, both parties and their advisors will have an opportunity to review and offer a written response to all inculpatory and exculpatory evidence directly related to the allegations gathered by the campus investigator(s).
- The Investigator will consider parties' written responses prior to completion of the investigative report which focuses on fairly summarizing relevant information.
- Once completed, the Investigator will share the final investigative report at the same time in hard copy or digital form to all parties.
- The final investigative report will be provided to the Hearing Chair/Decision-maker prior to the hearing. It will be available at the hearing to give each party equal opportunity to refer to such evidence during the hearing, including for the purposes of cross-examination.

The investigation will culminate in a written investigation report that will be submitted to the adjudicator. Although the length of each investigation may vary depending on the totality of the circumstances, the College strives to complete each investigation within thirty (30) to forty-five (45) business days of the transmittal of the written notice of Formal Complaint.

The Title IX Coordinator will promptly appoint a Hearing Chair who will oversee the hearing process and render a determination of responsibility for the allegations in the formal complaint, at the conclusion of the hearing process. After the Hearing Chair is appointed by the Title IX Coordinator, the Title IX Coordinator in consultation with the Hearing Chair will promptly transmit written notice to the parties including:

- notifying the parties of the hearing officer's appointment;
- setting a deadline for the parties to submit any written response to the investigation report;
- setting a date for the pre-hearing conference;
- setting a date and time for the hearing; and
- providing a copy of the College's Hearing Procedures.

Neither the pre-hearing conference, nor the hearing itself, may be held any earlier than ten (10) days from the date of transmittal of the written notice. Each party will have their own pre-hearing conference to address witnesses, evidence, rules of decorum, etc.

All individuals whose presence is requested at the live hearing will be notified in writing at least five (5) business days prior to the hearing. The hearing will typically occur no less than five (5) business days after the conclusion of the final pre-hearing conference. Notifications will be made via campus email by the Hearing Chair. Although the length of each adjudication by hearing will vary depending on the totality of the circumstances, the College strives to issue the hearing officer's written determination within fourteen (14) business days of the conclusion of the hearing. If a Formal Complaint is found to be substantiated, the College will take appropriate corrective and remedial action to prevent the recurrence of the conduct and correct its discriminatory effects. Discipline and remedies will take place immediately but may be stayed at the discretion of the Hearing Chair in consultation with the Title IX Coordinator. Appeals must be submitted to the Appellate Officer within three (3) business days after the determination is communicated, be in writing, and include rationale. Both parties will be given a reasonable, equal opportunity to submit a written statement in support or, or challenging, the responsibility determination. The Appellate Officer will determine the outcome of the appeal with ten (10) business days of receiving it. The parties will be notified in writing if the decision will take longer than ten (10) business days.

Rights of the Parties in an Institutional Proceeding:

During the course of the process described in the previous section, both the accuser and the individual accused of the offense are entitled to:

1. A prompt, fair and impartial process from the initial investigation to the final result.
 - A prompt, fair and impartial process is one that is:
 - Completed within reasonably prompt timeframes designated by the institution's policy, including a process that allows for the extension of timeframes for good cause, with written notice to the accuser and the accused of the delay and the reason for the delay.

- Conducted in a manner that:
 - Is consistent with the institution’s policies and transparent to the accuser and the accused.
 - Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
 - Provides timely access to the accuser, the accused and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.
 - Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused.
2. Proceedings conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

Training for College officials included, but was not limited to, the following:

- Title IX Coordinator Certification (Higher Ed)
 - Title IX: Planning for the Regulations
 - The New Title IX--A Detailed Analysis of New Rule Provisions and Their Impact
 - Title IX Investigator Training; Trauma-Informed Response and Advocacy
 - TCCNHS Title IX Overview
 - TCCNHS Employee Sexual Misconduct
 - TCCNHS CSA Training
3. The same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The institution may not limit the choice of advisor, but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
4. Have the outcome determined using the preponderance of the evidence standard .
5. Simultaneous, written notification of the results of the proceeding, any procedures for either party to appeal the result, any change to the result, and when the result becomes final. For this purpose, “result” means “any initial, interim and final decision by an official or entity authorized to resolve disciplinary matters” and must include the rationale for reaching the result and any sanctions imposed.

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

Sanctions for Students and Student Groups

While sanctions may be of a punitive nature, they are intended to be educational as well. Some sanctions may result in notation on the student's record and/or transcript. Sanctions will be determined on a case-by-case basis including the length of the sanction and what must occur for the sanction to end. The possible sanctions that may be issued, individually or in combination, for students found responsible for Prohibited Conduct include:

- **Statement of Concern** may be issued to students who are found in the presence of a policy violation, but who are not held formally accountable for that violation.
- **Warning.** This is a written notification that a student has committed certain violations and that continuance of such conduct will result in more severe disciplinary action.
- **Educational sanctions.** These may include, but are not limited to, alcohol education, mandatory counseling assessment and adherence to professional counseling recommendations, research paper or project, coordinating a program with a College employee, group education program, etc.
- **Behavioral contract.** The purpose of such a contract is to allow a student to successfully manage their behavior while remaining an active member of TCC community. Failure to complete the agreed-upon provisions of the contract will result in suspension from the College, unless the student voluntarily withdraws. If suspended or withdrawn, the student must follow the readmission process.
- **Administrative hold.** This occurs on student accounts and usually enforced when students have failed to comply with assigned tasks resulting from a hearing, informal resolution decision, or a disciplinary action. This hold may: preclude students from registering for classes, alter when a student may register, limit registration choices, and limit or delay the obtaining of documents such as transcripts and diplomas.
- **Disciplinary service.** This includes service hours expected to be completed in a given area as a way to give back to the campus or local community.
- **Fine/restitution.** This is a monetary penalty for violations such as vandalism or property damage. All fines must be paid by personal or cashier's check; they will not be applied to a student's account.
- **College restriction.** Restricted from certain buildings, events, activities, etc.
- **Disciplinary Probation.** The student is not in good disciplinary standing with the College.
- **Administrative Withdrawal.** Withdrawal from a specific course, major, or academic department.
- **Deferred Suspension.** This involves students who have been held responsible for behavior that warrants suspension but where mitigating circumstances and additional sanctions may allow a student to remain in the community while these sanctions are being completed. Failure to complete any of the additional expectations by the stated deadlines will lead to the immediate implementation of suspension without further hearing. In addition, if a student is found responsible for any further College policy violations, at a minimum, the student will automatically be recommended for suspension for at least one full semester.

- **Suspension.** The denial of the opportunity to continue at the College for a specified period of time (ordinarily no less than one semester), or indefinitely until the student's intervening record can support an application for readmission. While suspended, a student is not allowed to be on campus or to attend any official College event. In the event that additional sanctions are imposed in conjunction with the suspension, these sanctions will most likely be expected to be completed prior to an application for readmission to be considered. Upon return from suspension, the student will be placed on probationary status for one calendar year following completion of suspension. This sanction may be noted permanently on the student's transcript.
- **Dismissal.** The denial of the opportunity to continue as a student at the College. A student who has been dismissed is not eligible to apply for readmission. A student who is dismissed is not allowed to be on campus or to be at any official College event at any time. This sanction is noted permanently on the student's transcript.
- **Organizational Notification.** Written or verbal notification to inter/national organization representatives, officers or advisers.
- **Loss of Privileges.** Denial of privileges such as removal of services and access to facilities, restriction of use of campus financial accounts and/or student activity fee funding, attendance or participation in activities/programs, loss of theme or division housing privileges.
- **Social Probation.** Probationary status during which time the individual is restricted from participating in social events, including hosting as an organization.
- **Probation of Student Organization.** Probationary status for a specified period, typically not less than one semester, during which time the organization will be required to fulfill specific conditions before reinstatement to good standing.
- **Suspension of Student Organization.** Separation from the College for a specified period, typically not less than one semester. Involves loss of all rights and privileges of student organizations, including the use of College facilities, and probationary status for one year following completion of suspension.
- **Termination of Student Organization.** Termination is the most serious of College disciplinary actions for a student organization. It involves permanent separation of a student organization from the College and removal of recognition of the organization.

Sanctions for Employees or Employee Groups

The sanction may include any form of responsive action or progressive discipline as set forth in the Employee Handbook and Christ Hospital policy: Standards of Performance and Conduct. The sanctions may be training, referral to counseling and/or disciplinary action such as reminder, warning, reprimand, withholding of a promotion or pay increase or bonus, denial of access to certain benefits and opportunities, inability to transfer positions/locations, reassignment, decision-making leave, temporary suspension without pay or discharge (termination of employment).

Sanctions for Non-Students and Non-Employees

Appropriate sanctions may be warning, counseling, training, restricted campus access, restricted participation in College activities and events.

Protective Measures

In addition, the College can make available to the victim a range of protective measures.

- This may include assisting and allowing the Complainant to change his or her academic, transportation, or work situation, to the extent that the College has control over these environments, if options to do so are reasonably available and upon request of the Complainant. Such changes may be available regardless of whether the victim chooses to report the crime to local law enforcement.
 - Requests to change an academic, transportation, or work situation, or for any other protective measure, should be made to the Title IX Coordinator.
- The College will maintain as confidential any accommodations or protective measures provided to the Complainant to the extent that maintaining confidentiality will not impair the College's ability to provide them.
- If necessary, to disclose personal information to provide an accommodation or protective order, the College will endeavor to notify the Complainant before doing so.
- If a Complainant has obtained an ex-parte order of protection, full order of protection, or any other temporary restraining order or no contact order against the alleged perpetrator from a criminal, civil, or tribal court, the Complainant should provide such information to the Title IX Coordinator. The College, in conjunction with The Christ Hospital Department of Safety and Security, will take reasonable and legal action to implement the order.

Particular care will be taken to protect Complainants that are minors. In addition to the protections available to all Complainants, this also includes, but is not limited to, the College fulfilling any reporting obligations required by law when there is reasonable cause to suspect that a minor has been subject to abuse (including sexual violence, dating violence, and domestic violence).

Contemporaneously with the Respondent being notified of a Formal Complaint, the Title IX Coordinator will notify the Respondent of the availability of Supportive Measures for the Respondent, and the College will offer and make available Supportive Measures to the Respondent in the same manner in which it offers and makes them available to the Complainant. The College will also offer and make available Supportive Measures to the Respondent prior to the Respondent being notified of a Formal Complaint if the Respondent requests such measures.

Publicly Available Recordkeeping:

The College will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the College to the extent permitted by law.

Victims to Receive Written Notification of Rights:

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

Sex Offender Registration Program:

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Dean of Student Affairs and Title IX Coordinator at Dean of Student Affairs and Title IX Coordinator. State registry of sex offender information may be accessed at the following link:http://sheriffalerts.com/cap_main.php?office=55149

Timely Warnings and Emergency Response

Timely Warnings

In the event of criminal activity occurring either on campus or off campus that in the judgment of the President, Dean of Student Affairs, Vice President of Academic Affairs, Vice President of Strategy and Business Affairs, and Director of The Christ Hospital (TCH) Safety and Security constitutes a serious or continuing threat to members of the campus community, a campus-wide “timely warning” will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- TCH Safety and Security Department, 513-585-2222
- Secretary-Administrative, 513-585-2401
- Vice President of Strategy and Business Affairs, 513-585-0116
- Vice President of Academic Affairs, 513-585-0941
- Dean of Student Affairs, 513-585-4841

The College has communicated with local law enforcement asking them to notify the College if it receives reports or information warranting a timely warning.

Emergency Response

The President, Vice Presidents, and Dean of Student Affairs comprise the Threat Assessment and Response Team. The Dean of Student Affairs will serve as the chair of the Threat Assessment and Response Team and, in consultation with other College officials as appropriate, will assess the reported information and determine whether to convene the team.

The College’s legal counsel serves as an adviser to the team. Other College personnel and outside resources with relevant areas of specialization and responsibility may be called upon to assist the team, including but not limited to Associate Deans, Director of Safety and Security, law enforcement agencies, medical personnel, or other outside experts.

The College's emergency management plan is designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to fire, tornadoes, bomb threats, chemical spills, disease outbreaks, or armed intruders. TCC has communicated with local police requesting their cooperation in informing the College about situations reported to them that may warrant an emergency response.

Students, employees, and visitors are encouraged to notify the Christ Hospital Safety and Security Department at 585-2222 of any emergency or potentially dangerous situations.

Students, staff and visitors are encouraged to notify the Christ Hospital Safety and Security Department at Christ Hospital Safety and Security Department of any emergency or potentially dangerous situation.

The team will evaluate the information obtained in the course of the inquiry to determine the nature of the dangerous situation. The Dean of Student Affairs, in consultation with the President and Vice Presidents, evaluates information regarding weather emergencies to determine the College's response. Weather emergency notifications, including delayed starts and closures, will be announced as soon as they can be determined given evolving weather situations.

If the team determines that the person or situation poses a threat of violence or other harm, it usually will then develop, implement, monitor, and document a management plan designed to intervene and reduce the risk of harm that may be posed by the individual. The management plan may include, but is not limited to, the following (as circumstances and resources may dictate): release of a timely warning; family/parental notification; law enforcement intervention; disciplinary review and action; a behavioral contract; voluntary referral for mental health evaluation or treatment; mandated psychological assessment or other medical treatment; voluntary or involuntary withdrawal or suspension from the College; expulsion or dismissal; modification of the environment or other reasonable accommodations to mitigate risk; collaboration with the identified alleged target(s) to decrease vulnerability; engaging with the person of concern to de-escalate the situation; and ongoing monitoring.

If the team determines that the person of concern does not pose a threat, the team may take no action or may opt to monitor the person or situation for a period of time and re-evaluate the case, as necessary.

The institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

The Dean Student Affairs will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

The Threat Assessment and Response Team in collaboration with other appropriate personnel, will determine if there is a significant emergency or dangerous situation, who should be notified, and will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also, as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

Different threats require different approaches to responding. The team will assess and manage each situation in accordance with its best judgment and other applicable College policies, and any of the potential activities listed below may or may not be engaged in, depending on the circumstances of a particular situation. Generally speaking, the following procedures will apply:

- The Department of Safety and Security and/or other law enforcement agencies will coordinate all action in cases of a violent incident or imminent threat of violence on campus.
- Once information of concern is received by the team, the information will be evaluated and, if appropriate, representatives from the team will be convened (based on the persons involved and team member availability).
- The team, or the Team's Chair or designee, will first determine whether there is an imminent threat of harm or other emergency that requires immediate intervention. If so, the team Chair or designee will notify the Department of Safety and Security, may notify law enforcement, seek emergency medical assistance, or take other appropriate measures to address the imminent threat or situation. If not, the team or some portion of the team will usually conduct an initial screening to determine whether a full inquiry is warranted. There may be times when the student or employee making the potential threat will not be permitted on campus until an investigation has been conducted.

The Dean of College Support Services will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

Once the emergency is confirmed and based on its nature, the Threat Assessment and Response Team will determine the appropriate segment or segments of the College community to be notified.

At the direction of Threat Assessment and Response Team, the College's Safety and Security Department will contact local law enforcement of the emergency if they are not already aware of it. Where appropriate, The Christ Hospital Public Relations Department will contact or respond to local media outlets.

Crime	On Campus			Non Campus			Public Property		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
Arson	0	0	0	0	0	0	0	0	0
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0
Domestic Violence	1	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0

* The College does not have on-campus student housing facilities.

Hate crimes:

2022: No hate crimes reported.

2021: No hate crimes reported.

2020: No hate crimes reported.

Crimes unfounded by the College:

2022: 0 unfounded crimes.

2021: 0 unfounded crimes.

2020: 0 unfounded crimes.

Statistics for unfounded crimes provided by law enforcement agencies:

2022: 0 unfounded crimes.

2021: 0 unfounded crimes.

2020: 0 unfounded crimes.

Data from law enforcement agencies:

- The data above reflects statistics provided from law enforcement agencies related to crimes that occurred on the College's Clery Geography.