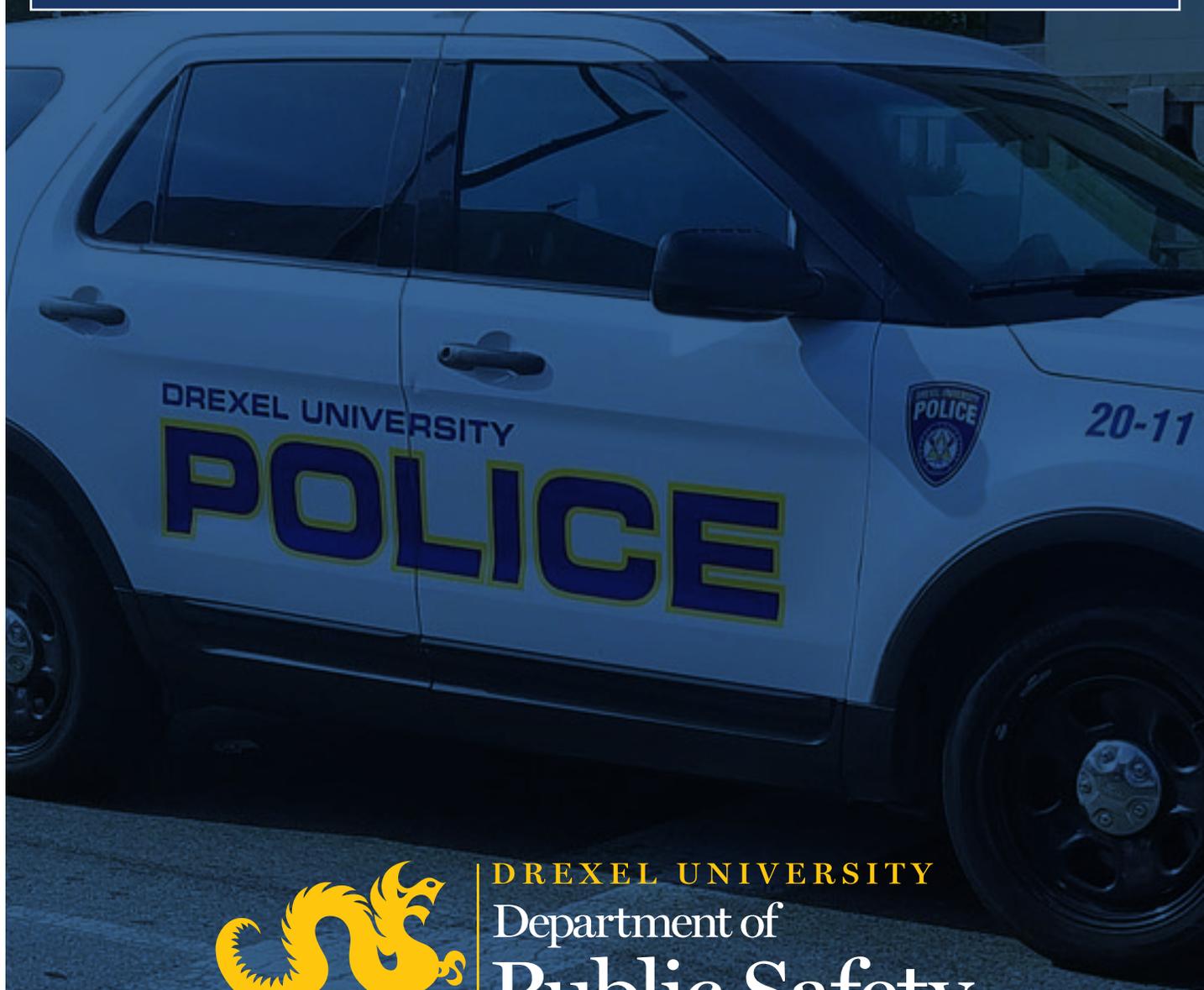


2021 DREXEL UNIVERSITY
ANNUAL SECURITY AND FIRE SAFETY REPORT



DREXEL UNIVERSITY
Department of
Public Safety

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MESSAGE FROM THE VICE PRESIDENT FOR PUBLIC SAFETY

On behalf of the members of the Drexel University Department of Public Safety, I want to welcome you to Drexel University, which is one of the most prestigious and vibrant universities in the nation. The Drexel University Department of Public Safety is dedicated to providing a safe and secure campus environment for its students, faculty, professional staff and visitors. All members of the Department are committed to the highest standards of professionalism in maintaining a safe and secure environment. Our core values are service, dedication, integrity, trust, and a commitment to education.

We accomplish our mission by employing modern law enforcement and security strategies blended with fire prevention services, emergency preparedness and technology. We strive to focus our programs, practices, and interactions on the needs of our diverse community, and work to be continually responsive to them. Vital and important components of our holistic public safety program are the relationships and partnerships we enjoy with the City of Philadelphia and various other organizations and law enforcement agencies that make up the University community.

We encourage all members of the Drexel University community to take an active role in assisting the Department of Public Safety by embracing and practicing the philosophy that “safety and security is a shared responsibility”. By working together, we can provide a safer environment in which to excel academically and professionally while improving the quality of life at Drexel University.

To learn more about the Department of Public Safety, please visit our website at or visit us at 3201 Arch Street, Suite 350. You are also welcome to email us at dps@drexel.edu.

Eileen W. Behr
Vice President for Public Safety

THE JEANNE CLERY DISCLOSURE OF CAMPUS SECURITY POLICY AND CAMPUS CRIME STATISTICS ACT

The [Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act](#), also known as the Clery Act, is a federal law that requires all colleges and universities to disclose certain timely and annual information about campus crime and security policies.

All public and private institutions of postsecondary education participating in federal student aid programs are subject to this Act. The U.S. Department of Education is the agency charged with enforcement of the Act and is where complaints of alleged violations can be made.

The [Handbook for Campus Crime Reporting \[PDF\]](#) assists universities and colleges in meeting the regulatory requirements of the Clery Act. The handbook covers such topics as Classifying and Defining Clery Crimes, Timely Warnings, the Daily Crime Log, and Annual Disclosure Requirements.

Preparation of Annual Security Report

Colleges and universities are required to publish an annual security report (ASR) by October 1 that contains the previous three (3) years' campus crime statistics, fire safety statistics and certain security policy statements, including sexual assault policies, which assure basic victims' rights and explain where students should go to report crimes. The report is made available to all current students and employees, while prospective students and employees are to be notified of its existence and afforded an opportunity to request a copy. Colleges and universities can comply using the Internet as long as the required recipients are notified and provided the exact Internet address where the report can be accessed. Printed copies are available upon request. A copy of the statistics must also be provided to the U.S. Department of Education.

The Department of Public Safety prepares the ASR with input from other departments, including the Office of Equality and Diversity and Student Life. The ASR is located online at drexel.edu/cleryreport. You may request a printed copy by e-mailing cleryact@drexel.edu or by visiting the Drexel Department of Public Safety at 3201 Arch Street, Suite 350, Philadelphia, PA, 19104.

Crime Statistics

Each college and university must disclose crime statistics for the campus area, unobstructed public areas immediately adjacent to or running through the campus, certain non-campus facilities including Greek housing, remote classrooms and University sponsored/arranged domestic and international student trips. The statistics are gathered from campus police or security, local law enforcement and [Campus Security Authorities](#).

Annually, Drexel Public Safety submits written requests to various law enforcement agencies located in the various jurisdictions where Drexel University is located.

Campus Security Authorities may report statistics by contacting the Department of Public Safety directly or by utilizing the online [Crime Statistics Report Form](#).

SECURITY OF AND ACCESS TO CAMPUS FACILITIES

Most Drexel University buildings are equipped with electronic access control devices (proximity card readers) that serve as keys allowing individuals to enter certain University buildings. Access control privileges are determined and assigned by University administrators based on specific needs and requirements of the University and the cardholder. It is a violation of University policy to attempt to use a University ID card to enter any area for which access has not been authorized or to lend or borrow the ID card of another person. More information can be found by reviewing the Authorizing Access To Drexel University Campus Buildings Policy at drexel.edu/publicsafety/about/policies/PS-2/.

Student Housing Facilities Security at Drexel University

All University residence halls require students to use their University ID to enter their assigned building. Guests are required to show ID and follow all Drexel policies and procedures. Residents are responsible for the actions and behavior of their guests at all times.

Residence hall main entrances are staffed 24 hours per day, 365 days a year. During late night hours, building access is monitored by uniformed Public Safety security officers.

- Access to residence halls is only permitted through the main entrance.
- Reception desks are the access control point for all residence halls.
- Emergency assistance can be obtained quickly through the reception desk.
- Drexel's Housing and Residence Life Team trains students on safety measures, including:
 - Remaining alert to the risks of tailgaters and propped doors.
 - The expectation that residents' rooms should always be locked.

For more information, visit the Office of University Housing website at drexel.edu/housing.

Security Considerations Used in the Maintenance of Campus Facilities, Including Landscaping, Grounds keeping and Outdoor Lighting

University facilities and campus lighting are maintained to minimize hazardous conditions and ensure safety and security. Malfunctioning lights and other unsafe conditions are routinely reported to the Facilities Department during building inspections for repair or correction. Doors, windows, door hardware, etc. are also checked for efficient operation.

DEPARTMENT OF PUBLIC SAFETY OVERVIEW

The Drexel University Department of Public Safety is a comprehensive public safety organization. The Department's mission is: *"To enrich the quality of life of our community by providing a safe and secure environment based upon effective relationships and excellence in service."* The Department accomplishes this mission by integrating the best practices of modern public and private security, law enforcement, fire safety, emergency preparedness and technology. The Department provides many safety and security services, safety awareness training and administers many community-oriented programs.

Drexel University's University City, Center City and Queen Lane campuses are situated in an urban environment. Keeping this in mind, consideration in any new construction or renovation planning includes lighting, video surveillance, electronic security systems and environmental design techniques to provide the highest level of safety for our students, faculty, and professional staff.

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The Department of Public Safety maintains a close working relationship with local/state/federal law enforcement agencies, local businesses, and academic institutions.

Responsibility for Campus Security

The Drexel University Department of Public Safety is responsible for providing security on Drexel's three Philadelphia campuses. To meet this responsibility, the department collaborates with a host of governmental and private public safety organizations along with departments within the University to address safety and security concerns.

The Drexel University Department of Public Safety is made up of six (6) operating units that report to the Vice President for Public Safety. They are: Police, Security, Operations, Fire & Emergency Services, Training & Accreditation, and Finance & Administration. All Public Safety employees receive a variety of specialized and continuous training including First Aid, Cardiopulmonary Resuscitation (CPR) and Automated External Defibrillator (AED).

Drexel University Police Department

The Drexel University Police Department (DUPD) is composed of armed, full-time, sworn municipal police officers who are empowered to enforce Federal and Commonwealth of Pennsylvania laws as well as City of Philadelphia Ordinances at the University's three Philadelphia campuses (University City, Center City and Queen Lane).

Officers conduct vehicle, bicycle and foot patrols and regularly meet and consult with students, faculty and professional staff regarding crime prevention and safety issues, and share tactical, strategic, and investigative information with other law enforcement agencies.

DUPD Detectives are responsible for investigating crimes, complaints and incidents that occur on campus property or within the University's patrol boundaries.

In November 2011, the Drexel University Police Department received international accreditation through the Commission on Accreditation for Law Enforcement Agencies (CALEA). The Drexel University Police Department is only one of 51 universities nationwide, the second university in Pennsylvania and one of 10 police departments out of over 1,100 in Pennsylvania to obtain this recognition. The department received reaccreditation in 2021.

DUPD maintain a full-time presence at the University City Campus.

DUPD will respond to incidents at our Center City campus in coordination with Philadelphia Police.

A sworn officer is assigned 40 hours per week at our Queen Lane campus. Availability varies to accommodate the events and schedule of the campus.

Drexel Police do not patrol or investigate incidents that occur at the LeBow College of Business, Malvern Campus. Please call 9-1-1 to report any emergencies.

Memoranda of Understanding (MOU)

The Drexel University Police Department works in partnership with the Philadelphia Police Department and under the guidelines of a Memorandum of Understanding. The MOU includes outlines the roles of the agencies, responsibilities for responding to and investigating crimes, arrest processing, support

services, on-scene chain of command and coordination procedures for releasing of information to the media.

Security Services

Security services, combined with effective community policing and relations, are imperative to providing a safe environment and improving the quality of life on and around the campus. The Security Services Unit is responsible for security officer management of our contracted security partner, AlliedUniversal Security.

The security officer force is comprised of officers assigned to the University City Campus, Queen Lane Campus and Center City Campus.

Public Safety Security Officers provide service to the Drexel community 24/7 and are responsible for enforcing the policies and procedures set forth by Drexel University. Their primary role includes community patrols by vehicle, bicycle and on foot, which are coordinated with Drexel University Police. They also provide a security presence in residential, academic, and administrative buildings as well as special event security and perform 24/7 walking escorts. These officers are unarmed and equipped with two-way radios with which they maintain communication with the Public Safety Communications Center.

All security officers receive training in security principles, patrol techniques, authority of arrest, defensive tactics, emergency procedures, crisis intervention, Drexel community orientation and 24 hours of field instruction prior to assignment. Public Safety security officers also receive CPR/First Aid and AED training and are required to complete a certification examination.

Security Services is also responsible for performing security assessments, crime prevention awareness and education.

Security officers do not have the authority to make arrests.

There are no AlliedUniversal security officers located at the LeBow College of Business, Malvern Campus. Security at this location is limited to a roving patrol officer. Please call 9-1-1 to report any emergencies

Fire & Emergency Services

The Fire & Emergency Services Unit manages safety programs and provides emergency response, safety education and awareness training for the three Drexel University campuses in Philadelphia.

They also perform life safety inspections of campus buildings, monitor fire system reliability testing, emergency evacuation and shelter-in-place drills. In addition, they participate in construction and renovation planning, serve as the University authority and liaison with regulatory agencies and are responsible for special event fire/life safety.

This unit also has the important responsibility for the development, review, and oversight of the University's Emergency Management Program.

Operations

The Operations Unit is responsible for radio and telephone communications, alarm monitoring, installation and management of security technology, crime data analysis, crime mapping, crime reporting and Clery compliance for the Department of Public Safety.

Requests for service are processed through the Drexel Public Safety Communications Center (DPSCC), which operates 24 hours a day, seven days a week. The DPSCC is staffed with highly trained personnel certified by the Association of Public Safety Communications Officials (APCO). In addition to receiving, processing, and responding to calls for service, DPSCC personnel also monitor burglar, fire, and duress alarms from University buildings. They manage the University electronic access control system, perform “virtual video patrols” of the campus using state-of-the-art Closed-Circuit TV (CCTV) and monitor the campus emergency telephone system.

Oversight of the DrexelALERT Emergency Notification System and Drexel Guardian program also falls under the Operations Unit. DrexelAlert enables fast and efficient dissemination of critical information to students, faculty, and staff of the Drexel University community a through email, text messaging and by phone, when necessary.

In November 2011, the Drexel University Public Safety Communications Center (DUPSCC) received international accreditation through the Commission on Accreditation for Law Enforcement Agencies (CALEA) making us the first stand-alone college / university communications center in the world to receive this prestigious recognition.

MONITORING AND REPORTING OF CRIMINAL ACTIVITY

Drexel University works in conjunction with the Philadelphia Police Department and other law enforcement agencies to monitor criminal activity at non-campus locations. The Philadelphia Police Department routinely provides information to the University regarding incidents involving students residing or visiting Philadelphia.

All reports of incidents received by the Philadelphia Police Department that are known to involve Drexel University students are indicated as such through their reporting system. Other university police agencies also report incidents involving Drexel students on their campuses. Students who participate in illegal activity or detrimental behavior at off-campus locations are held accountable by means of the University’s Code of Conduct.

University police officers on patrol are equipped to monitor radio dispatches from other local police departments. Reports to the Department of Public Safety involving students as victims in off-campus incidents are recorded and assistance is rendered in regard to appropriate support services available at the University.

Currently there are no officially recognized student organizations with non-campus locations.

DREXEL UNIVERSITY POLICY ENCOURAGING THE REPORTING OF CRIME

Any student, faculty or professional staff member who is a victim of crime, observes an incidence of crime or witnesses suspicious activity is strongly encouraged to promptly report the information to the Department of Public Safety by calling 215.895.2222, 24 hours a day, seven days a week, or by using one of the many emergency call boxes that directly establishes communication to the Public Safety Communications Center.

Calls for service will be answered by a certified Department of Public Safety Dispatcher who is trained to gather information and to dispatch the appropriate personnel to the location to take the necessary

steps to address the situation and /or document the incident.

All calls to the Public Safety emergency number (215.895.2222) and all emergency call box lines are digitally recorded for safety and quality assurance purposes.

If you are reporting crimes at any of Drexel's campuses, including University City, Center City, Queen Lane, Academy of Natural Sciences, and LeBow College of Business Malvern, you are urged to call:

215.895.2222 or 9-1-1 TTY: 215-571-4141

Procedures for Reporting Criminal Activity and Emergencies On-Campus

Anyone reporting an incident should be prepared to provide as much detailed information as possible such as name, location, time, date, and a description of the incident and to speak in a clear and calm manner.

Voluntary Confidential Reporting of Crimes – On-Campus

Drexel University has established a confidential reporting hotline to make it easy for anyone to report conduct that violates the law, University policy or the University's Code of Conduct in a confidential manner.

The Drexel Compliance Hotline should be used to report allegations of serious misconduct or in situations where it may be prudent for the reporter to remain anonymous. All other allegations of suspected improper conduct should be reported in accordance with the procedures established under the University's [CPS-4 Reporting Allegations Policy](#).

While the Drexel Compliance Hotline exists to support University Community Members in reporting serious allegation of serious misconduct, individuals are encouraged to first make reports of suspected misconduct directly to a supervisor or professor, department head, dean or a vice president, where possible.

EthicsPoint

To ensure the confidentiality of all reports, the University's reporting hotline is hosted by an external, third-party provider, EthicsPoint (ethicspoint.com/), utilized by many colleges and universities across the country. Policies and procedures for handling calls to the compliance hotline are outlined in the University CPS-4 - Reporting Allegations Policy, which can be found on [the Office of Compliance, Privacy and Internal Audit's website](#).

CPS-4 states:

D. Confidentiality

1. Reporters frequently make their reports in confidence. To the extent possible within the limitations of law and policy and as determined by the need to conduct a competent investigation, confidentiality shall be maintained. Reporters should be cautioned that their identity may become known for reasons beyond the control of the investigators or University administrators. Reporters should be prepared to be interviewed by the investigator. If there is a self-disclosure, the University is no longer obligated to maintain confidentiality. Some acts or

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omissions that are reported as Improper Conduct may have to be reported to law enforcement authorities pursuant to mandatory reporting laws or other rules and regulations imposed upon the University. Accordingly, it may not be possible to guarantee that confidentiality will be maintained at all times.

University Policy does not diminish EthicsPoint's contracted responsibility to protect the identity of callers who wish to remain anonymous to Drexel.

Reports can be made anonymously by calling a toll-free number or online:

By Phone: 866.358.1010 (Toll Free)

Online: drexel.ethicspoint.com

DrexelGuardian

Anonymous crime tips can also be sent using the Drexel Guardian mobile application. Details about this mobile app are found on [page 17 of this document](#).

Crime Tipline

Crime tips may also be submitted using our online [Crime Tipline](#) form.

Campus Security Authorities

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

- Drexel Police Officers
- Public Safety Staff and Allied/Universal Security Officers
- Title IX Officials
- Student Life Staff
- Student Centers Staff
- Student Activities Staff
- Student Housing & Residential Living Staff, including Resident Assistants
- Student Conduct Staff
- Faculty or Staff Advisors to Student Organizations
- Fraternity & Sorority Life Staff
- Director of Athletics
- Intercollegiate and Club Athletic Coaches
- Athletics Department Staff
- Student Health Center Director

Under Clery, a crime is reported when a victim, witness, other third party or even the offender brings it to the attention of a CSA or local law enforcement personnel. It does not matter whether the individual(s) involved in the crime or reporting the crime are associated with the institution. If a CSA receives the crime information and believes it was provided in good faith, he or she should document it

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as a crime report and provide this report to the Drexel University Department of Public Safety. In “good faith” means there is a reasonable basis for believing that the information is not simply rumor or hearsay. CSAs are not responsible for investigating crimes. Their role is to report all incidents immediately, no matter how minor an incident may seem. All investigations and crime classifications are the responsibility of sworn law enforcement personnel.

If employees are aware of any crimes that occurred on campus that were not reported to Drexel Department of Public Safety, it is important that they complete a Crime Statistic Report Form available at drexel.edu/crimereport and return it immediately.

Online Clery Act training is available for all staff. To access Clery Act training, click the link for Career Pathway in [DrexelOne](#) under the Employee tab. For employees who do not have access to Career Pathway, complete the training via [Drexel Learn](#).

It is important to remember that should at any time a crime be reported to anyone who is deemed as a Campus Security Authority, that individual should not wait until the end of the year to report that incident to Drexel Police, but notify the department immediately by calling 215.895.2222 or by filling out an online [crime report](#) form. The Department of Public Safety has a responsibility to notify the University community about any crimes that pose an ongoing threat to the community.

Pastoral and Professional Counselors

There are two classifications of individuals who, although they have significant responsibilities for student and campus activities, are not considered CSAs under Clery. They are pastoral counselors and professional counselors. A pastoral counselor is defined as a person who is associated with a religious order or denomination, is recognized by that religious order or denomination as someone who provides confidential counseling and is functioning within the scope of that recognition as a pastoral counselor. A professional counselor is defined as a person whose official responsibilities include providing mental health counseling to members of the institution’s community and who is functioning within the scope of their license or certification. This definition also applies to professional counselors who are not employees of the institution but are under contract to provide counseling at the institution.

Although pastoral counselors and professional counselors do not have to report crimes that are brought to their attention while serving in an official capacity, they are encouraged to inform their client/s of the procedures to [report crimes on a voluntary, confidential basis](#) for inclusion in the annual disclosure of crime statistics. Confidential and anonymous reports can be made by utilizing the [crime report](#) form.

IMPORTANT CONTACT NUMBERS

Emergency – All Campuses

215.895.2222 or 9-1-1 TTY: 215.571.4141

Non-Emergency

General Non-Emergencies	215.895.2222
Queen Lane Campus Security	215.991.8102
Academy of Natural Sciences	215.299.1019
LeBow College of Business Malvern Campus	215.571.3270
Environmental Health and Safety	215.895.5919
Fire and Life Safety	215.895.1550
Medical and Walking Escorts	215.895.2222
Residential Living and University Housing	215.895.6155
Victim Services Coordinator	215.895.6921

Medical

Student Health Center	215.220.4700
Poison Control Center	800.222.1222

Study Abroad and Other Travel Locations

Students, faculty, and professional staff are encouraged to plan ahead and bring with them all necessary emergency contact information. Students traveling abroad should also refer to the emergency information provided in their pre-departure materials.

The University has contracted with On Call International to provide emergency medical, political, and natural disaster assistance, evacuation, and repatriation coverage for employed faculty, professional staff and all students participating on a University-affiliated international activity

In the event of an emergency abroad, getting yourself to safety should be a priority. Once you are out of immediate danger, reach out to your local contact person for further assistance on how to proceed, or call one of the emergency travel numbers listed below:

To report a crime or for other emergencies, contact one of the emergency travel numbers listed below:

On Call International: 603.952.2038
American Citizen Services of any US Embassy abroad

Local police response and capabilities can vary greatly abroad.

Additional International Safety and Security information can be found by visiting the following website:
drexel.edu/oip/resources/travel-safety/

PUBLIC SAFETY ALERTS (WARNINGS)

Timely Warnings

To provide timely notice to the Drexel community in the event of a Clery Act crime that may pose a “serious or ongoing threat to members of the community”, the Department of Public Safety may issue a “timely warning” for the following crimes: arson; aggravated assault; criminal homicide; robbery; burglary; rape, fondling, incest, statutory rape, hate crimes, domestic violence, dating violence and stalking. The purpose of a timely warning is to notify the Drexel community of the incident and to provide information that may enable community members to better protect themselves from similar incidents. Timely warnings cover a broader source of reports (campus police or security, campus security authorities and off-campus law enforcement) than the crime log but are limited to those crime categories required in the Annual Report.

Timely warnings are distributed through the DrexelALERT system to Drexel University emails accounts and to mobile phone numbers registered through the DrexelALERT system. Timely warnings may also be published on the Drexel University Public Safety website: drexel.edu/publicsafety

DrexelALERT

Drexel University has implemented an emergency notification system called DrexelALERT, which enables fast and efficient dissemination of critical information to students, faculty, and professional staff of the Drexel University community.



Within minutes, DrexelALERT allows the Department of Public Safety to send alerts through text messaging, and e-mail to numerous devices, such as mobile phones, and e-mail accessible devices. This system provides Drexel students, faculty and professional staff with an additional layer of security and protection for emergency response, in conjunction with the University's already well-established emergency communication methods, such as Drexel-wide broadcast emails, online updates via the Drexel and Public Safety website homepages, and the coordinated use of public media outlets.

DrexelALERT is designed to provide emergency information regarding situations that constitute an ongoing threat to the Drexel community, such as an armed suspect on the loose, active fire or credible bomb threat, to name a few situations. An “all clear” message will be sent once an emergency situation is stabilized and it is deemed to be safe to resume normal activity. DrexelALERTs are not meant to be news releases regarding incidents that may have occurred or do not amount to an ongoing threat.

The effectiveness of this emergency notification system depends upon individuals providing accurate and up-to-date personal contact information.

For further assistance and more information about this system, please visit the DrexelALERT website drexel.edu/publicsafety/communications-operations/drexel-alert/.

Additional SMS/Text Message advisories:

DrexelALERT is an emergency alert of an ongoing threat to the campus community; however, the Department of Public Safety may utilize the emergency notification system for three additional types of advisories:

Public Safety ADVISORY is a message for incidents that may impact University operations, such as a major power outage or traffic disruptions.

Public Health ADVISORY is a message regarding potential health concerns, such as the H1N1 virus or a meningitis outbreak.

Campus Weather ADVISORY is a message announcing severe weather, such as a major snowstorm, in which the University may delay or cancel classes and/or operations.

Drexel GUARDIAN

Turn your cell phone into a personalized safety device by downloading the FREE Drexel Guardian application, available for [Android](#) and [Apple](#) devices. In the event of an emergency, Drexel Guardian allows the Drexel Public



Safety Communications Center to immediately access important information about you, such as your name, photograph, important medical information, and location when you initiate contact through the app — dramatically increasing the odds that they can find you and help you during an emergency. The service is free and voluntary, and the information you provide is kept completely confidential. In order to register for Drexel Guardian, you must first download the Drexel Guardian application. Search “Rave Guardian” in the Apple App Store for iPhones or Google Play Store for Android phones.

How does it work?

Emergency GPS Locator - Based on your cell phone signal, a GPS locator is activated during your self-initiated emergency communication. The registered profile information assists Drexel Public Safety in identifying, locating, and assisting you.

Set a Safety Timer - Notify Drexel Police or people you trust to check in on you if you are alone or in an unfamiliar place by setting a safety timer.

Manage & Message Your Guardians – Invite family, friends, or others to be your Guardian, and communicate with them within the app as needed.

Easy Emergency Communication - Call safety officials directly for help if you are in trouble through one-touch dialing and send anonymous text tips – including photos – if you see something suspicious.

For more information on how to register your phone, set up your personal profile, and how to activate Drexel Guardian in an emergency, view [Drexel Guardian’s Frequently Asked Questions](#)

Drexel Guardian is not a substitute for calling Drexel Police (215.895.2222) or Philadelphia Police (911). In the event of an emergency, users are advised to call 215.895.2222 or 911, as Drexel Guardian should not be used as the primary source for an emergency assistance call. Drexel Guardian is an optional back-up alert notification system that users may use at their discretion. As with any cell phone usage, certain factors (such as signal strength, type and quality of your phone carrier, and dead spots) can affect the GPS locator accuracy.

For further assistance and more information about this system, please visit the [Drexel Guardian website](#).

Website

The [Department of Public Safety website](#) contains current security and safety related information for the Drexel University Community. The website provides instant access to policies and procedures, security tips, public safety alerts, reporting information and information related to the Student Right to Know and Campus Security Act.

POLICY REGARDING EMERGENCY RESPONSE AND EVACUATION PROCEDURES

The University's Emergency Preparedness Plan includes information about Incident Response Teams, University operating status parameters, incident priorities and performance expectations, shelter-in-place and evacuation guidelines and local contingency and continuity planning requirements.

University departments are responsible for developing contingency plans and continuity of operations plans for their staff and areas of responsibility. The University conducts numerous emergency response exercises each year, such as tabletop exercises, field exercises, and tests of the emergency notification systems on campus. These tests are designed to assess and evaluate the emergency plans and capabilities of the institution.

DUPD police officers and supervisors have received training in Incident Command and Response to Critical Incidents on Campus.

University City Campus Response: When a serious incident occurs that causes an immediate threat to the campus, the first responders to the scene are usually DUPD, Philadelphia PD and the Philadelphia Fire Department, and they typically respond and work together to manage the incident. Depending on the nature of the incident, other Drexel Public Safety departments and other local, state, or federal agencies could also be involved in responding to the incident.

Queen Lane, Center City and Malvern Campuses response: Depending on the nature of the incident, DPS and DUPD will coordinate with and provide support to local, state, or federal agencies responding to the incident.

General information about the emergency response and evacuation procedures for DPS are publicized each year as part of the institution's Clery Act compliance efforts, and that information is available on the Drexel University Public Safety website. Information and updates to the Drexel University Emergency Preparedness and Response Plan are available on the [Drexel University Public Safety Emergency Preparedness website](#).

Notification to the Drexel University Community About an Immediate Threat

Drexel University Department of Public Safety receives information from various offices/departments on campus, such as the DUPD, the Office of Safety and Health, and the City of Philadelphia's Office of Emergency Management (OEM). If DPS confirms that there is an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the Drexel University community, DPS senior management will collaborate to determine the content of the message and will use some or all of the systems described below to communicate the threat to all or part of the Drexel University community as deemed necessary. Senior management will, without delay, and taking into account the safety of the community, determine the content and scope of the notification and initiate the notification system, unless issuing a notification will, in the judgment of the first responders

(including, but not limited to: DPS, Philadelphia PD and Philadelphia Fire Department), compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

In the event of a serious incident that poses an immediate threat to all or part of the Drexel University community, the University has various systems in place for communicating information quickly. Some or all of these methods of communication may be activated in the event of an immediate threat to all or part of the Drexel University campus community. These methods of communication include network emails, emergency text messages that can be sent to a mobile phone via DrexelALERT and local news media outlets. The University will post timely updates during a critical incident on the Drexel Public Safety website.

Drexel University students, faculty and professional staff can get additional details about DrexelALERT on [page 14](#) of this document.

Disseminating Emergency Information to the Larger Community

Drexel University has initiated working relationships with various public safety agencies in the University City area and other community partners. These partners have been enrolled into and will receive notices via the DrexelAlert system.

Procedures to Test Emergency Response and Evacuation

Evacuation drills are conducted by the Office of Fire and Emergency Services of the Department of Public Safety for the following campuses: University City, Center City and Queen Lane. The emergency response and evacuation procedures are conducted annually and quarterly for residential occupancies. Students learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. DPS does not tell residents in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, DPS and Housing Programs staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of a fire or other emergency. At Drexel University, evacuation drills are used as a way to educate and train occupants on fire safety issues specific to their building. During the drill, occupants “practice” drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm. In addition to educating the occupants of each building about the evacuation procedures during the drills, the process also provides the University an opportunity to test the operation of fire alarm system components. Evacuation drills are monitored by DPS and the Housing Programs Department, to evaluate egress and behavioral patterns. Reports are prepared by participating departments that identify deficient equipment so that repairs can be made immediately. Recommendations for improvements are also submitted to the appropriate departments/offices for consideration.

Students receive information about evacuation and shelter-in-place procedures during their first-floor meetings and during other educational sessions that they can participate in throughout the year. The House Staff members are trained in these procedures as well and act as an ongoing resource for the students living in residential facilities.

If an incident occurs and the buildings or areas become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors, because leaving the

area may expose population to that danger. Shelter in Place information is posted in every lobby or elevator lobby on each floor of every building.

Publicized and Unpublicized Drills and Exercises

DPS conducts numerous announced and unannounced drills and exercises each year and conducts follow-through activities designed for assessment and evaluation of emergency plans and capabilities. Fire and Emergency Services coordinate announced, and unannounced evacuation drills each semester, as described above, to test the emergency response and evacuation procedures, and to assess and evaluate the emergency evacuation plans and capabilities. Announcements for publicized drills will be made using email and the Drexel Public Safety Website.

SITUATIONAL AWARENESS & CRIME PREVENTION PROGRAMS

Emergency Call Boxes

Emergency call boxes are strategically placed throughout the University City Campus for safety and security. The emergency call boxes, when activated, automatically contact the Department of Public Safety Communications Center, and notify the dispatcher of the caller's exact location.

Whenever a call is received from an emergency callbox, the Public Safety dispatcher will automatically dispatch police and/or security personnel to that location. The Public Safety dispatchers are trained to send officers to call box activation regardless if someone answers or not.

Students and staff are encouraged to learn the locations of the emergency call boxes and to use them for all security-related and emergency communications.

For more information visit, drexel.edu/publicsafety/communications-operations/emergency-telephones/.

Walking Escort Services

University City Campus

The Drexel University Department of Public Safety provides walking escorts for all Drexel students, faculty and professional staff, 24 hours a day, 365 days a year to allow safe travel from one location to another. Walking escorts are provided on all campuses to any location within the Department of Public Safety patrol area. On the University City Campus, the patrol area is 30th to 36th Streets and Chestnut to Spring Garden Streets.

Escorts are also available from 10 a.m. until 3 a.m.; via the University's partnership with the University City District Ambassador Program

South of Market Street to Woodland Avenue between 30th and 50th Streets;

North of Market Street to Wallace Street between 30th to 40th Streets;

North of Market Street to Haverford Avenue between 40th Street to 42nd Streets

To request a walking escort:

- Ask any Public Safety police or security officer on patrol or inside a building;
- Call the Department of Public Safety Communications Center at 215.895.2222; or
- Use one of the many University emergency telephones located across campus.

Center City Campus

Drexel University offers walking escort services on the Center City Campus Monday through Friday from 6 p.m. to 10 p.m., within the boundaries of Vine Street to JFK Boulevard and 16th Street to Broad Street. To request an escort, please call 215.895.2222

Queen Lane Campus

The Queen Lane Campus also provides an escort service to approved designated areas. The boundaries for escorts are Henry Avenue to School House Lane, Queen Lane to Ridge and Midvale Avenues, Wissahickon Avenue to Lincoln Drive, Henry Avenue to Hunting Park Avenue and Queen Lane to Wayne Avenue.

Escorts are arranged through the Security Desk at Queen Lane either by phone call to 215.991.8102 or walk-up to the security desk.

Medical Escorts

The Drexel University Department of Public Safety provides medical escorts on all campuses for non-life-threatening medical conditions to Drexel University approved hospitals, emergency rooms and healthcare centers. For additional information, contact the Drexel University Communications Center at 215.895.2222.

Campus Shuttle

Drexel Real Estate and Facilities provides campus shuttle service to the University community. Illuminated rooftop signs permit easy shuttle identification from a distance. Members of the Drexel community are permitted unlimited usage at no charge. Upon boarding the shuttle, individuals are required to present a valid Drexel ID card to the driver. Schedules for the shuttle are available at the Creese Student Center and online at: drexel.edu/facilities/transportation/BusServiceSchedules/

Safeguard Your Valuables

“Safeguard Your Valuables” is an ongoing public safety awareness program, launched in collaboration with the Undergraduate Student Government Association and the Office of Student Life, to further promote the idea that “safety and security is a shared responsibility”.

We encourage the Drexel community to embrace this philosophy and take simple, yet important steps to keep their personal items safe.

- Always keep your personal items secured.
- Always lock and never prop doors.
- Secure your bicycle with a U-Lock.
- Remove personal and electronic items from vehicles that are in plain view.
- Report suspicious activity to Drexel Police by calling 215.895.2222 or from any emergency phone.

Bicycle Registration

All Drexel students, faculty and professional staff members are encouraged to register their bicycles with Drexel Public Safety. The goals of this program are to heighten awareness in the University community, deter would-be thieves and provide law enforcement with valuable crime-solving information. This free service takes only a few minutes to complete and includes:

- Documentation of bicycle description, serial number, and owner information;
- Engraving your bicycle with a registration number;
- A registration program sticker applied to your bicycle; and

- An information booklet.

Bicycle registration can be completed 24/7 at 3219 Arch Street. For more information, call 215.895.1550.

Public Safety and U

The “Public Safety & U” program is a one-hour interactive presentation designed to empower “U” as the key to personal and public safety. This workshop is designed to train the audience to effectively navigate irrational/disruptive behavior and active shooter scenarios, all while stressing the importance of strong decision-making skills. To empower the Drexel University Community, this interactive presentation discusses what roles each individual has in public safety, what role and resources the Department of Public Safety deploys at the University, and what resources are available or are working for their safety – this includes an interactive presentation of DrexelAlert, Drexel Guardian, our extensive camera system (CCTV), and our robust card access monitoring system. For more information call 215.895.1550.

Your Safety Is Our Goal

Public Safety offers virtual, interactive and monthly presentations on situational preparedness, called “Your Safety Is Our Goal.” Although there are some public safety factors that cannot be controlled, there are measures students can take to prevent themselves from being victims of a crime. In these Zoom presentations, Drexel Community Relations Officers Kim McClay and Thomas Cirone provide tips to encourage students to think and act accordingly — not to be scared, but to be prepared. Though they are focused on students, these presentations are open to the entire Drexel community. Sessions are advertised on the Drexel Event Calendar, in DrexelNow, and in the monthly Public Safety & U newsletter. To RSVP for a session and receive the Zoom link, please contact Officer Cirone at tjc94@drexel.edu.

UNIVERSITY ALCOHOL AND ILLEGAL DRUG POLICY

Drexel University has policies in place, consistent with Federal, State and local laws, prohibiting the use and possession of illegal drugs and drug paraphernalia, and also established guidelines for the use, possession and storage of legally prescribed drugs and medications while on campus.

Drug is defined as any legal or illegal substance (including over-the-counter medication, prescribed medication, alcoholic beverages, unprescribed controlled substances, or any other substances) which potentially affects the Faculty and Professional Staff Members and Student’s productivity and ability to perform duties, or which potentially affects the safety and/or well-being of the Faculty and Professional Staff Member and Student or others

Drexel's policy regarding alcohol is consistent with the laws of the Commonwealth of Pennsylvania. The consumption, distribution or service of alcoholic beverages must comply with the Pennsylvania Liquor and Crimes Code, which defines the lawful consumption and service of alcohol and prescribes sanctions for violations.

The University’s policies on substance abuse and alcoholic beverages are outlined in the Drug-Free Schools and Communities Act located online at (drexel.edu/studentlife/community_standards/code-of-

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[conduct/Drug Free Schools and Communities Act/](#)), along with related information on University sanctions for violation of these policies, criminal sanctions for the illegal possession or distribution of drugs and alcohol, health risks of drugs and alcohol, and places to get help concerning the illicit use and abuse of alcohol and drugs. Additional policies for employees are located online at: drexel.edu/hr/resources/policies/dupolicies/hr11/.

Concerns about enforcement of the Alcohol and Other Drugs Policy for faculty and staff should be directed to Human Resources at 215.895.2850. Concerns about enforcement of the Alcohol and Other Drugs Policy for students should be directed to the Office of the Dean of Students at 215.895.2506.

DRUG AND ALCOHOL ABUSE PROGRAMS AT DREXEL UNIVERSITY

Support for Drug and Alcohol issues and concerns is available through a coordinated campus network, which includes the [Drexel University Counseling Center](#), Drexel's Residence Life Office, and the [Employee Assistance Program](#) (offered to faculty, professional staff, graduate students and retirees).

Up to date information on available assistance and resources can be found on our Alcohol and Drug Education [website](#).

DATING VIOLENCE, DOMESTIC VIOLENCE and STALKING POLICY STATEMENTS

Prevention

Education Programs

Drexel educates all members of the University community about sexual misconduct and violence prevention through various programs, including mandatory freshman orientation programs each fall; outreach to students who are living in the residence halls or participate in fraternity and sorority life, athletics, or other campus activities; and outreach to faculty and professional staff through both online and in-person programs, though due to the COVID-19 pandemic, all programming was virtual. The Office of Equality and Diversity (OED) also offers violence prevention programs to University students and employees upon request. Information about available educational programs, violence prevention, bystander intervention, risk reduction, and the University's response to sexual harassment and sexual misconduct is available on OED's website at drexel.edu/oed, and directly through OED.

The University is committed to providing an environment free from discrimination, including discrimination on the basis of sex. Sexual harassment and sexual misconduct are considered forms of sex discrimination. The University will not tolerate any form of sexual harassment or sexual misconduct, including, but not limited to, sexual assault, sexual violence, sexual abuse, stalking, intimate partner violence and nonconsensual sexual conduct.

Definitions

The University prohibits sexual harassment and sexual misconduct against all University community members, regardless of sex, gender, sexual orientation, gender identity or gender expression. Prohibited Conduct, as set forth in this Policy, encompasses a broad range of unwelcome conduct of a sexual nature that is committed without consent, by force, intimidation, coercion or manipulation, or where a person is incapable of consent due to incapacitation. While the University is obligated to adopt certain definitions set forth under Title IX regulations, the University has chosen to expand Prohibited Conduct to include additional terms and to prohibit additional conduct that, while beyond the technical scope of the federal Title IX regulations, may impact the University community or its members. Consistent with the University's core values, this Policy addresses both conduct prohibited by Title IX and other acts of sexual misconduct.

A. Title IX Sexual Harassment

- 1) Sexual Harassment 1 (Hostile Environment): Unwelcome conduct on the basis of sex, determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to the University's education program or activity.
- 2) Sexual Harassment 2 (Quid Pro Quo): An individual conditioning the provision of a University aid, benefit or service on another's participation in unwelcome sexual conduct.
- 3) Sexual Assault: Sexual assault is having or attempting to have sexual contact with another individual without consent or where the individual cannot consent because of age or temporary or permanent mental incapacity (see below for definition of consent and incapacitation). Sexual contact includes:

1. Sexual intercourse (anal, oral, or vaginal), including penetration with a body part (e.g., penis, finger, hand, or tongue) or an object, or requiring another to penetrate themselves with a body part or an object, however slight; or
 2. Sexual touching of the private body parts, including, but not limited to, contact with the breasts, buttocks, groin, genitals, or other intimate part of an individual's body for the purpose of sexual gratification.
- 4) Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition:
- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - Dating violence does not include acts covered under the definition of domestic violence.
- 5) Domestic Violence: Violence committed:
- By a current or former spouse or intimate partner of the victim;
 - By a person with whom the victim shares a child in common;
 - By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; or
 - By a person similarly situated to a spouse of the victim. The relationship between the Respondent and the alleged victim must be more than two people living together as roommates; the people cohabitating must be current or former spouses or intimate partners.
- 6) Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (1) fear for their safety or the safety of others; or (2) suffer substantial emotional distress.

"Course of conduct" broadly captures the wide range of words, behaviors and means that perpetrators use to stalk victims, and, as a result, cause their victims to fear for their personal safety or the safety of others or suffer substantial emotional distress. "Course of conduct" means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

"Reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim.

“Substantial emotional distress” means significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.

B. Other Sexual Misconduct

- 7) University Sexual Harassment (severe or pervasive): Any unwelcome sexual advance; request for sexual favors; or other unwelcome verbal or physical conduct of a sexual-based nature, when such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual’s access to University employment or educational opportunities by creating an intimidating, hostile, humiliating, demeaning or sexually offensive working, academic or social environment. The effect will be evaluated based on the perspective of a reasonable person in the position of a Complainant.

A single or isolated incident may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to provide a hostile environment, particularly if the harassment is physical.

- 8) Non-Physical Intimate Partner Violence: Includes a broad range of behavior and conduct directed toward an individual who is, or has been involved in, a sexual, dating, domestic or other intimate relationship with the Respondent, when such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual’s access to work or educational opportunities by creating an intimidating, hostile, humiliating, demeaning or sexually offensive working, academic or social environment. Such conduct may include verbal, emotional and economic abuse, as well as threatened acts of violence against a person or property.
- 9) Sexual Exploitation: Sexual exploitation is an act or acts committed through non-consensual abuse or exploitation of another person’s sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage or any other non-legitimate purpose. See Appendix C, the University’s Sexual Harassment and Sexual Misconduct Policy (OED-3), for examples of behaviors that may constitute sexual exploitation.
- 10) Sexual Offenses Against Persons Under the Age of 18: Includes photographing, videotaping, filming or depicting on computer an individual under the age of eighteen (18) engaging in an actual or simulated sexual act, lewd exhibition of the genitals or nudity, if such nudity is depicted for the purpose of sexual gratification; or knowingly disseminating, possessing, controlling or displaying any book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction or other material depicting a child under the age of 18 engaging in an actual or simulated sexual act, lewd exhibition of the genitals or nudity if such nudity is depicted for the purpose of sexual gratification. Additional information related to the protection of minors and reporting requirements for suspected or actual instances of child abuse can be found in the in [the University’s PROTECTION OF MINORS AND REPORTING CHILD ABUSE Policy HR-73.](#)

C. Retaliation

Retaliation includes words or acts, as described below, committed against an individual or group of individuals involved in a protected activity. Protected activity includes making a good faith Report or filing a Formal Complaint under this Policy; filing an external complaint; or opposing in a reasonable manner and consistent with University policy an action reasonably believed to constitute a violation of this policy. Retaliation also includes intimidation, threat, coercion or discrimination against an individual for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the individual has made a Report or Formal Complaint of Prohibited Conduct, testified, assisted, or participated or refused to participate in any manner in any investigation, proceeding or adjudication meeting under this policy. Retaliation can take many forms, including, but not limited to, adverse action or violence, threats and intimidation that would discourage a reasonable person (under similar circumstances and with similar identities to the targeted individual or group) from engaging in protected activity.

Please note for reporting Clery Act statistics, Drexel University will refer to the [DEFINITIONS OF CRIMINAL OFFENSES](#) beginning on [page 69](#) of this document.

D. Statement on Consent and Incapacitation Consent:

Under [University Policy](#), “Consent” is a freely and affirmatively communicated willingness to participate in sexual activity or behavior, expressed either by words or clear, unambiguous action. Consent consists of an outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Consent may not be inferred from silence, passivity, lack of resistance or lack of active response. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. For this reason, relying on non-verbal communication can lead to misunderstandings.

Consent must be present throughout the sexual activity. At any time, a participant can communicate that they no longer consent to continuing the activity. Engaging in sexual activity without consent violates University policy and may result in criminal and/or civil liability.

Incapacitation: Incapacitation is the inability, temporarily or permanently, to give consent, because the individual is mentally and/or physically helpless due to drug or alcohol consumption, either voluntarily or involuntarily, or the individual is unconscious, asleep or otherwise unaware that the sexual activity is occurring. For additional information regarding the concepts of Consent and Incapacitation, please see Appendix F in [OED-3](#).

E. Definition of Consent - Pennsylvania Law

[Title 18 § 311. Consent.](#)

(a) General rule -- The consent of the victim to conduct charged to constitute an offense or to the result thereof is a defense if such consent negatives an element of the offense or precludes the infliction of the harm or evil sought to be prevented by the law defining the offense.

(b) Consent to bodily injury -- When conduct is charged to constitute an offense because it

causes or threatens bodily injury, consent to such conduct or to the infliction of such injury is a defense if:

- (1) the conduct and the injury are reasonably foreseeable hazards of joint participation in a lawful athletic contest or competitive sport; or
 - (2) the consent establishes a justification for the conduct under Chapter 5 of this title (relating to general principles of justification).
- (c) Ineffective consent -- Unless otherwise provided by this title or by the law defining the offense, assent does not constitute consent if:
- (1) it is given by a person who is legally incapacitated to authorize the conduct charged to constitute the offense;
 - (2) it is given by a person who by reason of youth, mental disease or defect or intoxication is manifestly unable or known by the actor to be unable to make a reasonable judgment as to the nature or harmfulness of the conduct charged to constitute the offense;
 - (3) it is given by a person whose improvident consent is sought to be prevented by the law defining the offense; or
 - (4) it is induced by force, duress or deception of a kind sought to be prevented by the law defining the offense.

Bystander Intervention

The University expects all community members to take reasonable and prudent actions to prevent or stop an act of sexual harassment or misconduct. Taking action may include direct intervention, calling law enforcement, or seeking assistance from a person in authority. Community members who choose to exercise this positive moral obligation will be supported by the University and protected from retaliation. This expectation is articulated in the University's Sexual Harassment and Sexual Misconduct Policy. The University provides information and resources regarding safe and effective bystander intervention options on its [Title IX Resources page](#), and through in-person trainings. The University's [Bystander Intervention webpage](#) can be found on the OED website.

Risk Reduction

Title IX Trainings

The Title IX Coordinator and Deputy Title IX Coordinators continue to receive ongoing training regarding the dynamics of and compliance issues surrounding sexual harassment and sexual misconduct. This education includes attending annual trainings such as those put on by the Student Conduct Institute.

These individuals also work to provide training to Drexel students, faculty, and professional staff through the following initiatives (not an exhaustive list).

Orientation

All new undergraduate and transfer students are required to complete an online module focused on the topic of sexual assault prevention before arriving on campus. The interactive module may also be viewed by parents/families to spark discussion of these topics. During Welcome Week, students receive information about violence prevention, reporting, resources, etc., through mandatory sessions with Public Safety (in cooperation with OED), and optional sessions with OED on safe social media use and

the impact of social media on discrimination, harassment, bias incidents, and sexual harassment and misconduct.

All students in the Graduate College are required to complete an annual, mandatory online training entitled, “Understanding Title IX and Respecting Individual Rights, Building Inclusive Community-Module 1,” a sexual and gender-based harassment and misconduct prevention program. This training outlines graduate students’ right to a learning environment free from discrimination, harassment, bias-incidents, and sexual harassment and misconduct, as well as their role in contributing to Drexel’s inclusive environment. This training is especially important for graduate students with employee-like roles, such as Teaching Assistants, Graduate Assistants, and Research Assistants, as it explains their Mandatory Reporting obligations. Beginning September 2021, all students in the Graduate College will be required to complete a similar training module purchased from an outside vendor.

Partnership with Residential Living

RAs, Resident Directors (RDs) and other Residential Living Office (RLO) professional staff attend extensive training on sexual assault prevention and reporting each fall through trainings with OED, DUPD and the Counseling Center. RDs and other RLO professional staff receive special training from OED about definitions, laws, reporting and crisis management systems, as well as the University’s policies and procedures for handling reports of sexual harassment and/or misconduct, as well as the protocol for adequately addressing reports of misconduct that are received on nights, weekends and holidays.

Partnership with Conduct Board

Faculty and professional staff members of the University Conduct Board are specially trained to hear cases that include violations of the Sexual Harassment and Sexual Misconduct Policy. Such training is repeated for new Conduct Board members annually.

Partnership with Fraternities and Sororities

Each fraternity/sorority chapter is required to host or attend at least one educational program focused on sexual assault awareness/prevention each calendar year.. RAs who serve in fraternity and sorority housing are trained annually with the rest of Residential Living staff.

Partnership with ROTC

OED facilitates sexual assault trainings for ROTC cadets, with a focus on bystander intervention.

Faculty and Professional Staff Trainings

With support from OED, Human Resources and the Office of General Counsel, an online training on Title IX and the University’s Sexual Harassment and Misconduct Policy is offered and mandatory for all University employees, including new employees.

OED also presents on Title IX quarterly at the “Managing Within the Law” course offered as part of the University’s Supervisory Certificate Program. Information about Title IX is presented during new employee orientation. And OED reaches out to faculty and professional staff throughout the year via the University’s various academic and administrative units, including, for example, training new academic

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advisors, providing workshops and trainings upon request, and attending faculty and professional staff meetings in the colleges and schools to speak about Title IX and the University's Sexual Harassment and Sexual Misconduct Policy.

Partnership with Drexel Public Safety

New Police and Public Safety Officers receive Title IX and Clery training at their orientation to the Drexel Police Department and as refresher trainings. All current Police Officers receive refresher training at least every two years unless the Director of Police Services determines the need for additional and updated training.

Public Safety also offers personal protection and safety classes to all members of the Drexel community throughout the year. These classes are designed to teach defensive concepts and techniques against various types of assault by utilizing easy, effective, and proven self-defense/martial arts tactics.

Other Public Safety efforts were outlined previously in the *Orientation* section.

Online Resources

OED created the [Title IX Resource Page](#) to provide comprehensive information and resources to the University community on gender discrimination, including sexual harassment and assault, bystander intervention, and violence prevention. Information is also provided on the [Public Safety website](#).

Counseling Center

Counseling Center therapists are trained in treating trauma, including trauma as a result of sexual misconduct, and the Counseling Center brings in OED annually when they onboard new interns as part of their APA accredited internship.

Other Education and Prevention Initiatives

Trainings Upon Request: OED provides educational interventions to various constituencies upon request. OED is continuing to develop prevention initiatives to meet the needs of the campus community in a remote learning environment.

Dragons Against Hazing: Sexual harassment/assault are discussed as a part of this year-round hazing prevention initiative and are the subject of at least one annual workshop during Hazing Prevention Week.

Domestic Violence and Sexual Assault Awareness Months (every October and April, respectively):

These yearly initiatives consist of a series of events and promotions, both individual to OED and in collaboration with campus partners (see the Partnership With Fraternities and Sororities section, above), designed to raise awareness and develop unity regarding the issue of sexual and domestic violence on campus, including:

- *Informational Brochures, Magnets, and Posters:* Each year, OED distributes brochures, magnets and posters during each campaign. All materials are branded to promote the slogans, "NOT A BYSTANDER."; "WHERE DO YOU STAND?"; and "Don't ignore sexual violence, See Something. Hear Something. Know Something. Say Something!", and are teal- and purple-colored. These promotional materials are distributed to members of the University community at critical outdoor spaces on campus and are also placed in residence halls offices, and other high-visibility places around campus

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- *“Teal Tuesdays:”* Every Tuesday during the month of April, members of the University community are encouraged to wear teal to raise awareness about sexual violence. Over the years, OED has distributed teal t-shirts emblazoned with the above logos to high-visibility members of the University community, including RLO (particularly RAs), Greek Life, Athletics and Recreation Center employees. Shirts were also handed out to the student body at-large, along with informational materials. OED usually distributes t-shirts during the campaign however due to the COVID-19 pandemic, we were unable to distribute these materials in person this year. Instead, OED shared community member’s participation in “Teal Tuesdays” via OED’s Instagram account.
- *Take Back the Night:* Drexel’s Take Back the Night has been hosted by Sigma Psi Zeta for 14 consecutive years and features speakers on sexual assault and violence, a candlelight vigil and donation opportunities to support local domestic violence charities. This year, due to the COVID-19 pandemic, Drexel partnered with other local Philadelphia colleges and universities for a virtual Take Back the Night event which included guest speakers and survivors.
- *“Safety and Survival- Women Against Abuse and OED Speaker Event”:* For Domestic Violence Awareness Month in October, OED hosted a Speaker Event with Women Against Abuse which included safety and survival information from a Women Against Abuse staff attorney and a personal story from a victim/survivor advocate who was previously a Women Against Abuse client and is now a motivational speaker.

Reporting Sexual Misconduct

To enable the University to respond to all reports in a prompt and equitable manner, any individual who wishes to report an incident of Prohibited Conduct under this Policy is encouraged to make a direct Report to the Title IX Coordinator.

Any person may report sexual harassment or sexual misconduct, whether or not the person reporting is the person alleged to be the victim of such conduct. A report can be made at any time, including during non-business hours, by contacting the Title IX Coordinator via email, telephone or mail, or by reporting in-person during business hours, using the contact information listed below. OED created and implemented an online reporting form, which can be found on [OED’s website](#). The OED incident reporting form is OED’s preferred and primary method for receiving reports. Using this form ensures that OED has the information necessary to make informed decisions concerning report response and the health and safety of impacted individuals and our Drexel community. However, if for some reason you are unable to submit the report using the form, individuals can still contact OED by phone or email to relay reports or to gather additional information about reporting. A Report regarding an emergency situation or a matter requiring the immediate assistance of law enforcement can be made 24 hours a day, 7 days a week by contacting 911 or Drexel University’s Department of Public Safety.

The University encourages all individuals, whether a complainant or a third party, to report incidents of sexual harassment or misconduct involving a member of the Drexel community to the Title IX Coordinator and, if applicable, the Drexel University Department of Public Safety.

Non-Emergency Reporting Options:

By Phone:	215.895.1405
By Email:	OED@drexel.edu

2021 Annual Report of Campus Security and Fire Safety Policies and Procedures

In person (during regular business hours):	James E. Marks Intercultural Center 3225 Arch Street, Ground Level, Suite 011 Philadelphia, PA 19104
Mail:	3141 Chestnut Street, 55G Philadelphia, PA 19104
Anonymously:	Drexel University Compliance Hotline 866.358.1010 (phone) drexel.ethicspoint.com (online)
Online Reporting Form	drexel.edu/oed/reporting/overview/

Medical Treatment

Students and employees are strongly encouraged to seek medical treatment. A medical provider can provide emergency and/or follow-up medical services, and the opportunity to discuss any health care concerns in a confidential medical setting. A medical exam following a sexual assault has two goals: first, to diagnose and treat the full extent of any injury or physical effect (sexually transmitted infection or pregnancy); and second, to properly collect and preserve evidence. There is a limited window of time (typically 72 to 96 hours) following an incident of sexual assault to preserve physical and other forms of evidence.

Special Victims Unit of the Philadelphia Police Department	215.685.3251/2/3
The Philadelphia Sexual Assault Response Center (PSARC) The mission of PSARC is to provide medical care and forensic examinations to victims of sexual assault in a private and personal setting designed to minimize stress or further trauma to the victim. PSARC has specially trained nurses on-call 24 hours a day, 7 days a week who will perform a rape exam, collect evidence, and provide advice and counseling referrals to victims of rape and sexual violence. The PSARC on-call response is activated through the Philadelphia Police Special Victims Unit.	300 East Hunting Park Avenue Philadelphia, PA 19125 215.800.1589
Jefferson University Hospital, Emergency Department & Sexual Assault Center	132 South 10th Street (On the corner of 10th and Sansom Streets) 215.955.6840 (Emergency)

Centralized University Reporting Options

To enable the University to respond to all reports in a prompt and equitable manner, any individual who wishes to report an incident of sexual harassment or misconduct is encouraged to make a direct report to the Office of Equality and Diversity and the University's Title IX Coordinator using the online reporting form found on [OED's website](#), by contacting OED by phone at 215.895.1405, or email at oad@drexel.edu. Reports can also be made in person, or anonymously via phone or online.

It is common for a student or employee to instead report sexual harassment or misconduct to another trusted employee of the University. For example, a student may choose to confide in an RA, a faculty member, or a coach. Similarly, an employee may choose to confide in a supervisor. For that reason, all such persons are trained on their mandatory reporting responsibilities under Drexel's Sexual Harassment and Sexual Misconduct Policy. The policy requires that all officers, deans, department heads, faculty members, academic advisors, directors, supervisors, professional staff, student employees, or volunteers who are responsible for student welfare must report any and all incidents of discrimination and harassment to Title IX Coordinator in the Office of Equality and Diversity, regardless of whether the individual witnessed the incident or learned of it through the Complainant or a third party.

Title IX Team

The Title IX Coordinator, working with the Title IX team, ensures that the University responds to all reports in a timely, effective and consistent manner. The Title IX Coordinator is charged with the review, investigation and resolution of all reports to ensure consistent application of policy and the integrated provision of interim measures to support the individuals involved and protect campus safety. The Title IX team always consists of: Title IX Coordinator, Deputy Title IX Coordinator(s), and Department of Public Safety. Depending on the nature of the report, it may also include Office of Student Conduct and Community Standards, the Dean of Students, Residential Living, Fraternity and Sorority Life, the Director of Human Resources, and the Provost's Office, as applicable.

Choosing Whether and Where to Report

The University recognizes that an individual's decision whether or not to report sexual harassment or misconduct is personal, and that there is no one "right" way to respond. Not every individual will be prepared to make a report to the University or to law enforcement, and individuals are not expected or required to pursue a specific course of action. Moreover, an individual does not have to decide whether or not to request a specific course of action at the time the report is made. The University recognizes that choosing to make a report, and deciding how to proceed after making the report, can be a process that unfolds over time. At all times, the University will seek to respect an individual's autonomy in making these important decisions.

There are [Confidential Resources](#) on campus and in the community available to individuals not wishing to make a report to the University. A list of confidential resources is provided on the University's Title IX website and brochures, and all Title IX trainings include information about confidential resources. The University respects the privacy interests of all individuals. All information reported will be shared only with those University employees who will assist in the investigation and/or resolution of the complaint.

Anonymous Reporting

Any individual may make an anonymous report concerning an act of sexual harassment or misconduct. An individual may report the incident without disclosing their name, identifying the respondent or

requesting any action. However, depending on the information available about a reported incident or the individuals involved, the University's ability to respond to an anonymous report may be limited.

Anonymous reports may be made by telephone to Drexel University's Compliance Hotline by calling 866.358.1010 (Drexel University) or online at drexel.ethicspoint.com. The University's Compliance Hotline is EthicsPoint, an externally monitored service that allows anyone to report suspected misconduct or other issues. This service allows the person making the report to confer anonymously with University administrators about additional details. All anonymous reports of Prohibited Conduct under this Policy will be forwarded to the attention of the Title IX Coordinator while maintaining the reporting party's confidentiality.

Anonymous crime tips can also be sent using the Drexel Guardian mobile application or via the [Crime Tipline](#) form on the Public Safety website.

Time Frame for Making a Complaint

There is no time limit on making a report of sexual harassment or misconduct to the University. However, individuals are strongly encouraged to report incidents of, or share information about, sexual harassment or misconduct as soon as possible after an incident occurs. The University's ability to provide adequate supportive measures or to adequately investigate allegations of prohibited conduct are greatly enhanced if information is reported to the Title IX Coordinator in a prompt manner. While the mere passage of time will not prohibit the University from investigating an allegation of prohibited conduct, the University's ability to access relevant evidence, parties or witnesses may be impacted. complainants are informed that the thoroughness of a sexual misconduct investigation is greatly enhanced if evidence is collected, preserved and maintained, witnesses are located, and statements are memorialized immediately.

The University may not be able to pursue disciplinary action against an individual who is no longer affiliated with the University. The University, however, will still conduct a Title IX review, offer appropriate accommodations to a complainant, and take appropriate action to eliminate a hostile environment.

Coordination with Law Enforcement

The University encourages complainants to pursue criminal action for incidents of sexual harassment or misconduct that may also be crimes under Pennsylvania law. In every case of sexual violence, the University, through the Department of Public Safety, will notify the Philadelphia Police Department of the allegations. The University will also assist a complainant in making a criminal report and will cooperate with law enforcement agencies if a complainant decides to pursue the criminal process to the extent permitted by law. However, a Complainant may also choose not to pursue criminal action, and under most circumstances, the Philadelphia Police Department will not force a complainant to pursue charges if they are not willing to do so.

A complainant may seek resolution through the University's complaint process, may pursue criminal action, may do one but not the other, or may do both. The University's policy, definitions and burden of proof may differ from Pennsylvania criminal law. As such, neither law enforcement's determination of whether or not to prosecute a Respondent, nor the outcome of any criminal prosecution, will be determinative of whether sexual harassment or misconduct under Drexel's policy has occurred. Proceedings under the Sexual Harassment and Sexual Misconduct Policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus.

At the request of law enforcement, the University may agree to defer its Title IX fact-gathering until after the initial stages of a criminal investigation. The University will nevertheless communicate with the Complainant regarding Title IX rights, procedural options and the implementation of supportive measures to assure safety and well-being. The University will promptly resume its Title IX fact-gathering as soon as law enforcement has completed its initial investigation.

No Contact Agreements, No Contact Orders and Orders of Protection

No-Contact Agreements and No-Contact Orders

A complainant or respondent may request, or the University may impose, communication and contact restrictions to prevent further potentially harmful interaction. These communication and contact restrictions generally preclude in-person, telephone, electronic or third-party communications. A student or employee can always request modification of the order. The University may also limit an individual or organization's access to certain University facilities or activities as part of the no contact order.

No-Contact Agreement: A complainant and/or respondent may request, or the University may impose, mutual communication and contact restrictions to prevent further potentially harmful interaction. Such communication and contact restrictions generally preclude in-person, telephone, electronic or third-party communications. A student or employee can always request modification of a no-contact agreement. The University may also limit an individual or organization's access to certain University facilities or activities as part of the no-contact agreement.

No-Contact Order: A complainant and/or respondent may request, or the University may unilaterally impose, restrictions on the communication and contact between the parties in order to prevent further, potentially harmful interaction. Such restrictions generally preclude in-person, telephone, electronic or third-party communications. The University may also limit an individual or organization's access to certain University facilities or activities as part of a No-Contact Order. The University will consider modification of a No-Contact Order upon the request of a party.

Protection From Abuse Order or Sexual Violence Protection Order

In some cases, an individual may wish to consider a Protection From Abuse Order or Sexual Violence Protection Order from the local courts of the Commonwealth of Pennsylvania. This is a civil proceeding independent of the University. If a court order is issued the University will, to the extent possible, assist the protected person in benefitting from the restrictions imposed by the court and will also facilitate on-campus compliance with the order. The court enforces the order through law enforcement. The University does not enforce the order but does enforce its own rules. It is important to note that a civil court order may, unless the court is fully informed, prevent the University from conducting a hearing in which students who are subject to the order want to be present and provide information.

Confidentiality of Victims and Other Necessary Parties

Issues of privacy and confidentiality play important roles in this policy and may affect individuals differently. While they are closely related, the concepts of privacy and confidentiality are distinct terms that are defined below.

Privacy refers to the discretion that will be exercised by the University, including the Office of Equality and Diversity, in the course of any investigation or disciplinary processes under this policy. Information

related to a report of prohibited conduct will be handled discreetly and shared with a limited circle of University employees or designees who need to know in order to assist in the assessment, investigation and resolution of the report and related issues. University employees will receive training in how to safeguard private information. The University will make reasonable efforts to investigate and address reports of prohibited conduct under this policy, and information may be disclosed to participants in an investigation as necessary to facilitate the thoroughness and integrity of the investigation. In all such proceedings, the University will maintain the privacy of the parties to the extent reasonably possible. The privacy of student education records will be protected in accordance with the Family Educational Rights and Privacy Act (FERPA). Access to an employee's personnel records is also governed by University policy and by applicable local laws.

Confidentiality refers to the statutory protections provided to individuals who disclose information in legally protected or privileged relationships, including professional mental health counselors, medical professionals, and ordained clergy (Confidential Resources). These Confidential Resources must maintain the confidentiality of communications disclosed within the scope of the provision of professional services. When an individual shares information with a Confidential Resource as a confidential communication in the course of a protected relationship, the Confidential Resource cannot disclose the information (including information about whether an individual has received services) to any third party without the individual's written permission or unless permitted or required consistent with ethical or legal obligations. Similarly, medical and counseling records cannot be released without the individual's written permission or unless permitted or required consistent with ethical or legal obligations.

When evaluating, addressing and resolving any reported allegation of prohibited conduct, every effort will be made to respect and protect the privacy interests of the individuals involved. Such efforts will take into consideration the need for a thorough review of the matter, the need to ensure the safety and protection of any individual(s) involved and the safety of the broader University community.

Information related to a Report of Prohibited Conduct will be shared on a "need-to-know" basis, meaning it will only be shared with those individuals who "need-to-know" specific information in order to assist in providing supportive measures and accommodations, and to assist in the resolution of a matter.¹ Students or employees wishing to obtain confidential assistance or access to campus resources without making a Report to the University may do so by speaking with professionals who are obligated by law to maintain confidentiality. These professionals, who are identified in Appendix E, include individuals in the Student Health Center, the Student Counseling Center, pastoral counselors within the Office of Religious and Spiritual Life and the Employee Assistance Program.

All processes outlined in this Policy will be conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, any applicable federal, state and/or local laws and regulations and any other relevant University policies. No information related to a specific case shall be released or disclosed, except as required or permitted by law or University policy.

¹ Under the Title IX regulations, the University is required to keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a Report or filed a Formal Complaint of sexual harassment, any Complainant, any individual alleged to be the perpetrator of sex discrimination, any Respondent and any witness, except as may be permitted by Family Educational Rights and Privacy Act, as otherwise required by law or to carry out the an investigation, hearing or judicial proceeding in compliance with this Policy.

Appropriate and Available Services for Victims

All Drexel community members can expect notice of confidential and non-confidential but private resources, including medical treatment and mental health counseling services, both on campus and in the community.

The University is committed to treating all individuals with dignity, care and respect. A complainant, respondent or any other University community member impacted by prohibited conduct will have equal access to support and resources through the University, including but not limited to, counseling services through the Counseling Center (in the case of students) or through the Employee Assistance Program (in the case of employees). The University recognizes that any individual involved in an incident of sexual harassment or misconduct may have questions or concerns about the allegations, their options and the processes outlined in this Policy, and we encourage University Community members to seek the support of the campus and community resources listed below. The University's Title IX Coordinator and Deputy Title IX Coordinators can provide guidance in making decisions and obtaining information about available resources. Resources and support are available regardless of whether a report is filed or the formal resolution process is pursued, and individuals are encouraged to use available resources, regardless of whether the incident occurred recently or in the past.

All Drexel community members can expect:

- the opportunity to meet with the Title IX or Deputy Title IX Coordinator or a member of the Title IX Team to answer questions regarding the University's complaint processes for sexual harassment and sexual misconduct;
- notice of confidential and non-confidential but private resources, including medical treatment and mental health counseling services, both on campus and in the community;
- notice of the option to pursue law enforcement action and to be assisted by the Drexel University Police Department in making a report;
- that the University take appropriate steps to protect individual safety and well-being and to maintain a campus environment free from harassment; and
- the right to be free from retaliation.

Confidential Resources and Support

Drexel encourages all University community members to report incidents of sexual harassment and misconduct. The University recognizes, however, that not every individual will choose to make a report to the University or to local law enforcement. Regardless of an individual's decision about making a report to the University, the University offers several confidential resources to students, professional staff, and faculty. Individuals seeking to talk to someone about an incident of sexual harassment or misconduct in a confidential manner, without making a report to the University or triggering any action by the University, may utilize the following confidential medical, mental health and clerical resources. The confidentiality of these resources is statutorily protected, such that they are prohibited from releasing an individual's information without that individual's express consent (except under limited circumstances that pose an imminent danger to the individual or to others.)

Student Resources

Counseling Center

Creese Student Center

3210 Chestnut Street, Suite 201

Phone: 215.895.1415

Students who have experienced sexual harassment or misconduct and those who have been accused of such conduct may discuss their situations confidentially with counselors at the Counseling Center. An individual's conversations with University counselors will not be disclosed to anyone else in the University, except in cases of a threat of imminent physical harm.

Student Health Center

University City Science Center
3401 Market Street, Suite 105B
Phone: 215.220.4700

The University encourages any individual who believes that they have been the victim of sexual misconduct to seek medical treatment. The Drexel Student Health Center is staffed by faculty physicians and nurse practitioners from the Drexel University College of Medicine Department of Family and Community Medicine. The center provides a range of health services in a confidential environment.

Pastoral Counselors affiliated with the Office Spiritual and Religious Life

James E. Marks Intercultural Center
3225 Arch Street, Basement Level
drexel.edu/studentlife/diversity/spiritual-and-religious-life/
Phone: 215.895.2501

Pastoral Counselors provide essential support to the students, faculty and professional staff at Drexel University in the expression, understanding and practice of faith. Pastoral Counselors currently affiliated with the University include professional religious staff from Open Door Christian Community, Baptist Campus Ministries, Hillel of Greater Philadelphia and Newman Catholic Campus Ministry.

Employee Resources

Employee Assistance Program

drexel.edu/hr/benefits/other-benefits/employee-assistance-program/
Phone: 888.881.5462

Employees may also receive confidential counseling services through the Employee Assistance Program. The Employee Assistance Program, which is administered by SupportLinc, provides guidance and counseling for faculty and professional staff, as well as Drexel graduate students and retirees. Connect with a live SupportLinc representative by calling their 24/7 helpline at 1.888.881.5462. Log in to the [SupportLinc website](#) (username "drexel") under the Web Access section of the homepage. To download the SupportLinc eConnect® mobile app for EAP and MAP users, visit the Apple/iTunes or Google Play app store. (The mobile username is "drexel.")

Family Medicine University City

Located at the University City Science Center at 34th and Market streets, adjacent to the Drexel Student Health Center, the medical practice is run by Tower Health Medical Group. For questions or to schedule an appointment, call 215.220.4720 or visit the [website](#).

Campus Resources

In addition to the confidential resources listed above, all Drexel community members have access to further resources at the University that can assist an individual who has concerns about sexual harassment or misconduct. The professional staff affiliated with the departments listed below are trained to support individuals affected by sexual harassment or misconduct and to work with the University's Title IX Coordinator to provide a consistent University response and promote a safe and healthy educational and employment environment. While not bound by confidentiality, these resources will maintain an individual's privacy and will only share information about a matter to the extent necessary for the University's resolution of a matter.

Office of Equality & Diversity

James E. Marks Intercultural Center, 3225 Arch Street, 215.895.1405

Drexel University Department of Public Safety

3201 Arch Street, Third Floor, 215.895.2222 (Emergency), 911 (Emergency)

Community Resources

Students and employees are also encouraged to access resources in the local community. These organizations can provide crisis intervention services, counseling, medical attention and assistance in navigating the criminal justice system. All individuals are encouraged to utilize the resources best suited to their needs, whether on or off campus. In general, off-campus resources can provide assistance to individuals wishing to make a Report to the University, but will not notify the University without the consent of the complainant. See the University's Title IX Resource Page at drexel.edu/titleix for more information.

Academic, Employment or Residence Modifications

A complainant or respondent may request an academic or employment accommodation or a change in residence after a report of sexual harassment or sexual misconduct. An individual who requests assistance in changing their academic or living situation after an incident of sexual misconduct will receive appropriate and reasonably available accommodations. These may include:

- academic accommodations, including a change in class schedule, taking an incomplete, dropping a course without penalty, attending a class via remote or other alternative means, providing an academic tutor, or extending deadlines for assignments;
- change in housing assignment;
- change in work assignment or schedule; and/or
- providing an escort to ensure safe movement between classes and activities.

Emotional Support

The University will provide counseling services through the Counseling Center or will assist in providing a referral to off-campus agencies as detailed in the Campus and Community Resources section of the OED-3 policy. Counseling and emotional support is available to any member of the campus community.

Emergency Removal and Administrative Leave

Where the initial assessment of a report of sexual harassment or misconduct indicates an ongoing risk of harm to the safety or well-being of an individual or members of the University community, the

University may institute emergency removal (in the case of students) or administrative leave (in the case of non-student employees), regardless of whether a Formal Complaint has been filed. In all cases, the University will tailor the scope of any such removal or leave to the circumstances justifying their imposition, and will typically not seek to implement measures that are more restrictive than reasonably necessary to mitigate identified risks to the safety or well-being of individuals or the University community.

Emergency Removal: Emergency removal means a temporary restriction on an individual's access to the University's educational programs or activities, including but not limited to residential and academic facilities, as determined on a case-by-case basis.

A decision regarding emergency removal will only be made after the University conducts and documents a safety and risk analysis based upon the specific circumstances known at the time of the assessment. Emergency removals will only be affected if the University determines that a threat to the physical health or safety of a student or another individual, arising from the allegations of sexual harassment or misconduct, justifies removal. In circumstances where emergency removal is justified, and in cases of administrative leave, an individual or organization may be denied access to campus. When an individual is removed on an emergency basis, the University will provide the individual with notice of the decision, as well as an opportunity to appeal the decision immediately following removal.

Administrative Leave: Administrative leave means a temporary removal from the work environment of a University employee, with or without pay, following an allegation of prohibited conduct or other similar circumstance, pending resolution of the matter under this Policy. Administrative leave may include restricted access to the University's facilities and resources. A decision regarding administrative leave will be made based on the specific circumstances presented.

Procedures for Institutional Disciplinary action

The University will review and respond to all reports of sexual harassment and sexual misconduct. The Title IX team, under the leadership of the Title IX Coordinator, will oversee the University's investigation and resolution. In every report of sexual harassment or sexual misconduct, the University will make an immediate assessment of any risk of harm to individuals or to the campus community and will take steps necessary to address those risks. These steps will include interim measures to provide for the safety of the individual and the campus community.

Procedures for Resolving Reports Against Students (From OED-3 Appendix A)

The University is committed to providing a prompt and equitable response to all reports and Formal Complaints of Prohibited Conduct under the Sexual Harassment and Sexual Misconduct Policy (Policy). The University's resolution processes for addressing Prohibited Conduct are grounded in the principles of support and fairness for all parties, including the provision of procedural protections that ensure notice; equitable opportunity to participate; and neutral and impartial investigation, resolution, and appeal procedures. The definitions for specific forms of Prohibited Conduct and other core concepts are included in [Appendix G – Glossary to OED-3](#). This resolution process will be used to resolve reports and Formal Complaints of Prohibited Conduct made against Students.

I. Process Overview

1. Report

Any person may make a Report against any student or student organization for alleged violation(s) of the University's Sexual Harassment and Sexual Misconduct Policy (OED-3). Reports should be referred to the Title IX Coordinator (or to OED), who will ensure consistent application of the Policy to all individuals and allow the University to respond promptly and equitably to eliminate the prohibited conduct, prevent its recurrence, and address its effects.

2. Initial Assessment

Upon receipt of a Report, the University will conduct an Initial Assessment of the matter and will promptly contact the Complainant and provide information about and resources and options, including the Formal Resolution Process and available Supportive Measures. The Complainant will be invited to meet with the Title IX Coordinator, or their designee, to learn more about Supportive Measures and the Formal Resolution Process and to discuss the Complainant's preferences for resolution and Supportive Measures.

During the Initial Assessment, the University will:

- Evaluate whether the alleged conduct falls within the purview this Policy;
- Assess appropriate Supportive Measures; and
- Evaluate the need for any Protective Measures, including emergency removal of a Respondent if they are determined to present a threat to health or safety of an individual or the University Community.

The Initial Assessment will consider the nature of the Report; the safety of the Complainant, other individuals or identifiable groups, and/or the University Community; the Complainant's expressed preferences for resolution and Supportive Measures; and the necessity for any Protective Measures, including emergency removal, to protect the safety of the Complainant or the University Community.

3. Preliminary Inquiry

When a Complainant is interested in participating in the University's Formal Resolution Process (to include Investigation and Adjudication or Alternative Resolution), an Investigator will meet with the Complainant to gather information about the Report. The Investigator will review the information gathered during the interview with the Complainant and will assess whether the alleged conduct, if proved, would constitute a Policy violation. The Investigator will not make credibility determinations in conducting the Preliminary Inquiry.

If the Investigator determines that the alleged conduct, if proved, would not constitute a Policy violation, the University will notify the Complainant and inform the Complainant of other options and resources available at the University or within the community, as appropriate. If the Investigator determines that the elements of a Policy violation have been raised, the Complainant may indicate their willingness to proceed with a Formal Complaint.

4. Formal Complaint

Any Complainant may file a Formal Complaint for a violation of this Policy against any student. In cases where a Complainant does not wish to file a Formal Complaint or in other circumstances, as appropriate, the Title IX Coordinator may, in their discretion, file a Formal Complaint against a student for a violation of this Policy.

The University will promptly notify all Parties in writing of the filing of the Formal Complaint and will provide the Parties with information about the Investigation and Adjudication process, Alternative Resolution options, and available Supportive Measures. The written notice will include details regarding the alleged Prohibited Conduct, including sufficient details – to the

extent known – regarding the nature of the alleged Prohibited Conduct; the identities of the individuals involved; and the date and location of the alleged action(s)/incident(s). Should any of this information be unknown at the time a Formal Complaint is filed, and later become known, the University will provide updated written notice, as appropriate. Likewise, if additional allegations that are not included in the original notice provided to the Parties are brought to the attention of the Investigator, the University will provide notice of the additional allegations to the Parties.

At any time after a Formal Complaint is filed, either Party may request an Alternative Resolution. Each resolution process is guided by the same principles of fairness and respect for all Parties. All Respondents will be presumed “not responsible” until a Determination is reached.

Dismissal of Formal Complaint

The Title IX Coordinator will determine whether the conduct alleged in the Formal Complaint falls within the scope of the policy and the definitions of Prohibited Conduct. The Title IX regulations require the University to dismiss some or all of the allegations in the Formal Complaint related to Title IX Sexual Harassment if: 1) the conduct alleged, even if substantiated, would not constitute Title IX Sexual Harassment as defined in the Title IX regulations; 2) the conduct did not occur within the University’s education program or activity; or, 3) the conduct did not occur against a person in the United States. This means that the University may be required by law to dismiss some or all of the allegations in the Formal Complaint under Title IX and provide the parties notice of the dismissal and the opportunity to appeal that dismissal.

In the event of a mandatory dismissal required by the Title IX regulations, a matter may still proceed through the University’s Formal Resolution Process, so long as the remaining allegations set forth in the Formal Complaint, if proved, would constitute violations of this Policy.

In addition, the Title IX Coordinator may dismiss a Formal Complaint, at any stage of the process, in any of the following three circumstances:

1. The Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;
2. The Respondent is no longer enrolled or employed by the University; or
3. Specific circumstances, including a Complainant’s decision not to respond to outreach by the Title IX Coordinator, prevent the University from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein.

The decision about whether to dismiss a Formal Complaint, in whole or in part, may be made at any time in the process and will be communicated to all parties in writing. Either party may appeal the decision to dismiss the Formal Complaint to [decision-maker].

Dismissal of the Formal Complaint will be communicated to the parties simultaneously and in writing. Either party may challenge the dismissal of a formal complaint by notifying the Title IX Coordinator in writing of the challenge within five (5) business days of the decision being communicated. The other party will be notified of the challenge. Challenges to dismissals will be review by [decision maker] within [x] days.

Title IX Coordinator Discretion to File a Formal Complaint

The Title IX Coordinator also has the discretion to file a Formal Complaint. In evaluating the appropriate manner of resolution, including whether the Title IX Coordinator will file a Formal Complaint in the

absence of a formal complaint by the Complainant, the Title IX Coordinator will consider the following factors: The totality of the known circumstances;

- The nature and scope of the alleged conduct, including whether the reported behavior involves the use of a weapon;
- The respective ages and roles of the Complainant and Respondent;
- The risk posed to any individual or to the campus community by not proceeding, including the risk of additional violence;
- Whether there have been other reports of other prohibited conduct or other misconduct by the Respondent;
- Whether the report reveals a pattern of misconduct related to Prohibited Conduct (e.g., illicit use of drugs or alcohol) at a given location or by a particular group;
- The Complainant's interest in the University not pursuing an investigation or disciplinary action and the impact of such actions on the Complainant;
- Whether the University possesses other means to obtain relevant evidence;
- Fairness considerations for both the Complainant and the Respondent;
- The University's obligation to provide a safe and non-discriminatory environment; and
- Any other available and relevant information.

The Title IX Coordinator may also re-open a report under this policy if any new or additional information becomes available, and/or if the Complainant later decides that they would like a formal resolution to occur.

In those instances when the Title IX Coordinator files a Formal Complaint, the Title IX Coordinator will notify the Complainant that the University intends to initiate an investigation. The Complainant is not required to participate in the investigation or in any of the actions taken by the University.

The University's ability to investigate and respond fully to a report may be limited if the Complainant requests anonymity or declines to participate in an investigation. The University will, however, pursue other steps to limit the effects of the reported conduct and prevent its recurrence. In all cases, the final decision on whether, how and to what extent the University will conduct an investigation will be taken in connection with a report of Prohibited Conduct will be made in a manner consistent with this policy.

II. Notice of Allegations

The University will promptly notify all parties in writing of the filing of the Formal Complaint and will provide the parties with information about the Investigation and Adjudication Process, Alternative Resolution options, and available Supportive Measures. The written notice will include:

- Information regarding the alleged Prohibited Conduct, including sufficient details – to the extent known – regarding the nature of the alleged Prohibited Conduct; the identities of the individuals involved; and the date and location of the alleged action(s)/incident(s). Should any of this information be unknown at the time a Formal Complaint is filed, and later become known, the University will provide updated written notice, as appropriate. Likewise, if additional allegations that are not included in the original notice provided to the parties are brought to the attention of the Investigator, the University will provide notice of the additional allegations to the parties.
- Notice of the University's resolution processes;

- A statement that the Respondent is presumed not responsible for alleged Prohibited Conduct and that a determination regarding responsibility will be made at the conclusion of the Investigation and Adjudication process;
- Advisement that a party may have an Advisor of their choice who may be, but is not required to be, an attorney and who may inspect and review evidence in the Investigation; and
- That knowingly making false statements or knowingly submitting false information during the Formal Resolution processes is prohibited under this Policy and the Student Code of Conduct.

At any time after a Formal Complaint is filed, either party may request an Alternative Resolution. Each resolution process is guided by the same principles of fairness and respect for all parties.

All Respondents will be presumed “not responsible” until a Determination is reached.

Advisors and Support Persons

Advisors

The Complainant and Respondent may each have an Advisor of their choice present with them at any meeting, interview or hearing conducted under this Policy. An Advisor may be, but is not required to be, an attorney. If a Party does not have an Advisor at the time of a hearing, the University will provide the Party with an Advisor for the purpose of conducting appropriate cross-examination during the hearing. An Advisor may not provide opening or closing remarks during a hearing and may not otherwise speak on behalf of a Party during any hearing, meeting or interview conducted under this Policy.

Support Person

In addition to an Advisor, the Complainant and Respondent are each permitted to have a Support Person at every stage in the Investigation and Adjudication process. The Support Person may not be a Party or witness involved in the Investigation. The Support Person may accompany a Complainant or Respondent to any disciplinary proceeding or related meeting. The Support Person may not speak or otherwise participate in the hearing or meetings.

Advisors and Support Persons are expected to maintain the privacy of any records shared with them during the course of any process under this Policy.

III. Alternative Resolution

Upon the filing of a Formal Complaint, the Complainant or the Respondent may request an Alternative Resolution. Participation in any Alternative Resolution processes must be voluntary and mutual, and may begin only after both Parties provide voluntary, informed, written consent to attempt Alternative Resolution.

The University reserves discretion in determining whether any given case is appropriate for Alternative resolution. Alternative Resolution is not available in cases of alleged sexual harassment of a student by a University employee, and may be deemed inappropriate in other cases that include, for example: allegations of Prohibited Conduct involving penetrative acts; allegations of significant violence or threats of violence; instances in which the circumstances of the alleged Prohibited Conduct give rise to concerns that the Alternative Resolution process might be used to abuse, harass, intimidate, or manipulate a Party; or where the University has received more than one Report or Formal Complaint of Prohibited Conduct against the same Respondent under this Policy.

Alternative Resolution may encompass a broad range of conflict resolution strategies, including but not limited to a facilitated discussion between the parties, with the assistance of the Title IX Coordinator or

their designee; formal mediation between the parties, conducted by the Title IX Coordinator or a trained designee; or targeted or broad-based educational programming or training. Both Parties will be provided with written notice disclosing the requirements of the Alternative Resolution process, including the right to withdraw from the process at any time prior to Final Resolution; any consequences resulting from participating in the Alternative Resolution process; the circumstances under which the Parties are precluded from requesting to resume the Investigation and Adjudication process with regard to the same allegations; and the records that will be maintained or could be shared as a result of participation in the process.

The Alternative Resolution process may be made available to the Parties at any point prior to a final Determination in the matter. The University will not compel a Complainant or a Respondent to engage in any form of Alternative Resolution. Participation in Alternative Resolution is voluntary at all times, and either Party can withdraw from the Alternative Resolution process and resume the Investigation and Adjudication process at any point prior to Final Resolution of the matter. Any notes taken or information disclosed during an Alternative Resolution Process will not be shared or used outside of the Process, except to the extent that they may be relevant or directly related to a subsequent Investigation and Adjudication conducted under this Policy, as required by the applicable federal regulations. If the Parties reach an agreement during the Alternative Resolution process, they will be asked to sign a written agreement, or Final Resolution, outlining the terms of the agreement. The Final Resolution indicates the conclusion of the Alternative Resolution process and will be maintained by the Office of Equality and Diversity for the sole purpose of ensuring any resulting agreements, remedies, and/or sanction(s) are upheld and/or satisfied, as appropriate. After a matter has reached Final Resolution, the same matter cannot proceed through the Investigation and Adjudication process.

Alternative Resolution processes will typically be completed within sixty (60) days. The time frame may be extended for good cause to accommodate the availability of the Parties, to provide reasonable accommodations, to address University breaks or vacations, or for other legitimate reasons. Any extension of the time frame, and the reason for the extension, will be shared with the Parties in writing.

IV. Investigation

A. Time Frame

The Investigation and Adjudication process will typically be completed within one hundred and twenty (120) days of the filing of the Formal Complaint, although the complexity of a report may require a longer time frame. The time frame may be extended for good cause to ensure the integrity and completeness of the investigation, to accommodate the availability of the Parties, their Advisors and/or witnesses, to provide reasonable accommodations, to address University breaks or vacations or for other legitimate reasons. In cases where there is a concurrent law enforcement investigation, the University may temporarily delay the investigation as appropriate, which may result in the time frame being extended. Any extension of the time frame, and the reason for the extension, will be shared with the Parties in writing.

B. Consolidation of Multiple Formal Complaints

The Title IX Coordinator, or their designee, has the discretion to consolidate multiple Formal Complaints against more than one Respondent, by more than one Complainant against one or more Respondents, or by one Party against the other Party, into one investigation if the allegations arise out of similar facts or circumstances. In deciding whether to consolidate multiple Formal Complaints into a single

investigation, the Title IX Coordinator will consider whether the evidence related to each Formal Complaint would be relevant in reaching a Determination with respect to the others.

C. Investigator

The University, through the Title IX Coordinator, will designate an Investigator, or Investigators, of its choosing. Any Investigator used by the University, whether internal or external, must have specific training and experience investigating allegations of sexual harassment and sexual misconduct. The investigation will be fair, impartial and thorough, and all Parties and witnesses will be treated with the appropriate sensitivity and respect.

D. Participation of the Parties

Complainants and Respondents are encouraged, but never required, to participate in the University's Investigation and Adjudication process so that the facts of each Report can be explored and responsible Parties held accountable for their misconduct, if warranted. The University will make multiple good faith attempts to contact the Parties to encourage their participation in the Investigation and Adjudication process. If a Party is unresponsive to multiple good faith attempts to contact them, the Investigator will make reasonable efforts to conduct the investigation without the participation of the Party. A Party who elects not to participate in any one phase of an investigation will still be notified of any progress or developments in the process as they occur, and will be provided with an opportunity to participate in subsequent phases of the Investigation and Adjudication process.

If a Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw a Formal Complaint, or any allegations therein, the University will make every reasonable effort to comply with that request and to dismiss the Formal Complaint. As explained more fully in OED-3, there may be exceptional circumstances when the University decides to proceed with the Investigation and Adjudication process despite the request of a Complainant. The Complainant, however, will not be required to participate in the process.

E. Presumption of Non-responsibility

All Respondents will be presumed "not responsible" unless and until a Determination is reached in a matter.

F. Investigation Process

The first step of an Investigation will usually be a preliminary interview of the Complainant by the Investigator. The Investigator will then coordinate the gathering of information from the Complainant, the Respondent, and any other individuals who may have information relevant to the Determination. Before any interview with a Party, the Investigator will provide to the Party a written notice of the date, time, location, participants and purpose of the interview and will allow sufficient time for the Party to prepare for the interviews. Both Parties will have an equal opportunity to provide the Investigator with evidence that is directly related to the allegations, whether inculpatory or exculpatory, and the names of possible witnesses, including expert witnesses.

The Investigator will collect all submitted evidence that is directly related to the allegations, regardless of whether or not the evidence is ultimately deemed sufficiently material to be included in the Investigative Report. The Investigator will gather any available physical or medical evidence, including documents, communications between the Parties and other electronic records, to the extent they are directly related to the allegations.

The Investigator will gather prior or subsequent relevant allegations of, or Determinations of responsibility for, misconduct by the Respondent. Evidence of an occurrence or occurrences of Prohibited Conduct or other relevant behavior that establishes a pattern of conduct, establishes identity, motive, intent or opportunity may be admissible during the Investigation and Adjudication process. Evidence of a pattern of similar conduct, either before or after the conduct in question, regardless of whether there has been a prior Determination of a policy violation, may be admissible. Information or evidence that relevant evidence was destroyed is admissible and may be considered in assessing the credibility of the Parties and the weight of the evidence.

At the conclusion of the fact gathering phase of the Investigation, the Investigator will prepare an Investigative Report that fairly summarizes the relevant evidence.

G. Inspection of Evidence and Review of Investigation Report

Upon the conclusion of an Investigation, the Parties will be given an opportunity to inspect and review a draft Investigative Report and any evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint. The University may, in certain cases, choose to redact information that is not directly related to the allegations or that is otherwise privileged. Upon receiving the draft Investigative Report and evidence, the Parties will have ten (10) days to submit a written response, including any additional information or comment or request that additional investigative steps be taken. At the conclusion of the 10-day period, the Investigator will review any responses received from the parties, and will conduct any additional investigative steps, as needed, before completing a final Investigative Report.

H. Statement on Relevance

“Relevant” evidence and questions refer to any questions and evidence that tend to make an allegation of sexual harassment or misconduct more or less likely to be true. Relevant evidence includes both inculpatory and exculpatory evidence. Not all evidence gathered by the Investigator that is directly related to the allegations raised in the Formal Complaint will be considered relevant – including, for example, information that is privileged but for which the individual holding the privilege has not submitted a written waiver; or prior sexual history of a Complainant, unless offered to demonstrate consent or that someone other than Respondent committed the alleged Prohibited Conduct. The Investigator will determine the relevancy of evidence for inclusion in an Investigative Report.

Relevant evidence and questions do not include the following types of evidence and questions, which are deemed “irrelevant” at all stages of the Investigation and Adjudication process:

- Evidence and questions that constitute, or seek disclosure of, information protected under a legally recognized privilege, including medical, psychological, or similar records, unless the person holding such privilege has waived the privilege by providing voluntary, written consent; and
- Evidence and questions about the Complainant’s sexual predisposition or prior sexual behavior unless:
 - o They are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or
 - o They concern specific incidents of the Complainant’s prior sexual behavior with respect to the Respondent and are offered to prove consent.

I. Threshold Determination

After considering and incorporating any additional relevant information or comments made by the Parties, the Investigator, in consultation with the Title IX Coordinator, will make a Threshold Determination as to whether the elements of a Policy violation have been sufficiently raised to proceed to Adjudication. In reaching a Threshold Determination, the Investigator may consider 1) whether the Prohibited Conduct alleged in the Formal Complaint, if assumed to be true, would constitute a violation of OED-3; and 2) whether a reasonable person could conclude, based on the information gathered in the Investigation, that a violation of OED-3 had occurred.

Upon the conclusion of an Investigation, both Parties will be advised in writing of the Investigator's Threshold Determination. If the Threshold Determination is that the elements of a Policy violation have not been raised, or that a reasonable person could not conclude, based on the information gathered in the Investigative Report, that a Policy violation occurred, either Party may appeal the Threshold Determination under the Appeals procedures set forth in this Appendix (See Section VI).

If it is determined that the elements of a Policy violation have been raised or that a reasonable person could conclude, based on the information gathered in the Investigation, that a Policy violation occurred, each Party will be given an opportunity to submit written information for consideration in determining appropriate Remedies and Sanctions, should the Respondent be found responsible for the alleged Prohibited Conduct during any subsequent Adjudication process. A Complainant may submit an impact statement, and a Respondent may submit a mitigation statement. These statements will be considered as part of the sanctioning process only, and will not be made available to any Adjudicator(s) until or unless a Respondent has been determined to be responsible for alleged Prohibited Conduct.

In addition, if the Threshold Determination is that the elements of a Policy violation have been raised, or that a reasonable person could conclude, based on the information gathered in the Investigation, that a Policy violation occurred, the Title IX Coordinator will meet with each Party to discuss next steps in the process.

V. Adjudication

Permissible manners of adjudication include 1) resolution by a single Adjudicator, whether internal or external to the University, or 2) resolution by a University Conduct Standards Board. In either manner of adjudication, the standard for evaluating whether OED-3 has been violated is preponderance of the evidence ("more likely than not").

A. Acceptance of Responsibility

After receiving the formal charge(s) from the Office of Student Conduct, the Respondent may choose not to contest the charge(s) and give up the right to a hearing by accepting responsibility for all charges. If a Respondent accepts responsibility, the Complainant will be notified in writing, and both Parties will have the opportunity to submit written information for consideration by the Office of Student Conduct; a Complainant may submit an impact statement, and a Respondent may submit a mitigation statement. The Office of Student Conduct, in consultation with the Title IX Coordinator, will impose appropriate Remedies and Sanctions (see below for guidelines and range of permissible Sanctions). The Complainant and Respondent will be simultaneously notified of the Remedies and Sanction(s) and rationale therefor in writing. This decision may be appealed by both Parties only as to Unduly Harsh Sanction. If there is no appeal by either Party after an acceptance of responsibility, the Remedies and Sanctions imposed by the Office of Student Conduct will be final.

B. Choice of Adjudicator

Where it is determined that the report should be adjudicated by a Conduct Standards Board, the Title IX Coordinator and Office of Student Conduct shall designate Conduct Standards Board members who are trained, neutral, impartial, and free from conflict.

At the discretion of the Title IX Coordinator, in consultation with other relevant University constituents, the University may engage an Adjudicator to serve in lieu of the Conduct Standards Board whenever, in the exercise of judgment, doing so will serve the fair and equitable resolution of the complaint.

The Adjudicator, who may be internal or external to the University, will be a neutral Party, usually an attorney, retired judge or seasoned student conduct administrator, who is trained in the dynamics of sexual harassment and sexual misconduct and the University's policies and procedures.

The Adjudicator/Conduct Standards Board will be supported by the Title IX Coordinator, or their designee,) and a designee of Student Life (overseeing Student Conduct Processes on campus), who will be present during the hearing to serve as a resource for the Adjudicator/Conduct Standards Board on issues of policy and procedure, and to assure that policy and procedure are appropriately followed throughout the hearing.

C. Hearing Procedures

The Complainant, Respondent, Advisors, and witnesses will be notified in writing as to the time, date, and location of the hearing, as well as the identity of the Adjudicator(s) assigned to their case. Either party may challenge or object to the assignment of any Adjudicator on the basis of a conflict or bias. Challenges to Adjudicator assignments must be made in writing to the Title IX Coordinator at least six (6) days prior to a hearing, in order to provide an opportunity for an alternate Adjudicator to be identified without causing a delay in the hearing process. Hearings are not open to the public.

In advance of the hearing, the Senior Executive Director for Student Conduct, or designee from Student Life, will provide the Investigative Report to the designated Adjudicator/Conduct Standards Board. The Adjudicator/Conduct Standards Board will have an opportunity to review the Investigative Report at least five (5) days prior to the hearing. The Complainant, the Respondent, and their Advisors will be provided with the Investigative Report for their review at least ten (10) days prior to the hearing.

The Parties are required to promptly inform the Title IX Coordinator, or their designee, of their Advisor of choice who will attend the hearing at least five (5) days in advance of the hearing. If a Party notifies the Title IX Coordinator, or their designee, that they do not have an Advisor for the hearing, the University will provide the Party with an Advisor to conduct cross-examination on their behalf at the hearing. The Title IX Coordinator, or their designee, may reschedule the hearing to ensure that the Advisor has adequate time to prepare for the hearing.

Unless the Complainant or Respondent has declined to participate in the Investigation and Adjudication process, both the Complainant and Respondent will be expected to appear before the Adjudicator/Conduct Board. The Complainant and the Respondent may appear at the live hearing in person or virtually through a remote electronic method.

There will be a single verbatim audio recording of all hearings before the Adjudicator/Conduct Standards Board, which will be the sole property of the University. In the event of an appeal, the recording will be

made available to the Parties for inspection and review upon request. This recording will be maintained for a period of seven (7) years.

Regardless of whether an Adjudicator or Conduct Board is used, the general procedure to be followed during hearings is as follows:

- Introductions of all attendees
- Overview of investigation by Investigator
- Questions posed to Investigator by Advisors and Adjudicator/Conduct Board
- Brief introductory remarks from the Complainant
- Brief introductory remarks from the Respondent
- Questions posed to Complainant by Respondent's Advisor and Adjudicator/Conduct Board
- Questions posed to Respondent by Complainant's Advisor and Adjudicator/Conduct Board
- Questions posed to Complainant's Witnesses by Respondent's Advisor and Adjudicator/Conduct Board
- Questions posed to Respondent's Witnesses by Complainant's Advisor and Adjudicator/Conduct Board
- Short recess
- Brief concluding remarks by Complainant
- Brief concluding remarks by Respondent

The hearing procedure may depart from this general order, depending on the circumstances of each case, but in no instance will either Party be deprived of an opportunity to observe substantive portions of the hearing; to ask or answer questions to or from the other Parties, witnesses, or the Adjudicator/Conduct Board; or to provide introductory or concluding remarks.

D. Cross-Examination

During the hearing, each Party's Advisor may ask the other Party and any witnesses relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the Party's Advisor and never by a Party personally. The Parties may not question each other or other witnesses directly but may raise questions to be asked of the other Party and witnesses through their Advisor.

Before any Party or witness answers a cross-examination or other question, the Adjudicator/Conduct Board must first determine whether the question is relevant and explain any decision to exclude a question as irrelevant. The Adjudicator/Conduct Standards Board may consult with the Title IX Coordinator or designee regarding any questions posed. If the Adjudicator/Conduct Standards Board determines that a question is irrelevant, the Party or witness to whom the question was posed will be directed not to answer the question.

Examples of irrelevant information that may be excluded include, but are not limited to, information protected by a legally recognized privilege; evidence about a Complainant's prior sexual history; and Party or witness statements that have not been subjected to cross-examination at the hearing. If a Party or witness does not submit to cross-examination at the hearing, the Adjudicator/Conduct Standards Board must not rely on any prior statement, either written or oral, of that Party or witness in reaching a Determination; provided however that the Adjudicator/Conduct Standards Board cannot draw an inference about the Determination based solely on a Party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.

A Party's Advisor may appear and conduct cross-examination even when the Party who they are advising does not appear. Similarly, where one Party does not appear and that Party's Advisor of choice does not appear, the University will designate an Advisor to cross-examine the other, appearing Party on behalf of the non-appearing Party, resulting in consideration of the appearing Party's statements but not the non-appearing Party's statements. Following cross-examination of the Parties and witnesses by Advisors, the Adjudicator/Conduct Standards Board may ask questions of the Parties and witnesses to seek relevant evidence and to follow up on questions asked by the Advisors.

VI. Determination

The Adjudicator/Conduct Standards Board will objectively evaluate all relevant evidence and will reach a Determination based upon a preponderance of the evidence standard. If a Respondent is determined to be responsible for an allegation of Prohibited Conduct, the Adjudicator, Conduct Standards Board, or other individual(s) responsible for determining appropriate sanctions will be provided with access to any impact or mitigating statements that have been submitted by the Parties prior to making a determination regarding remedies and Sanctions. Determination

Depending on the manner of adjudication, Remedies and Sanctions will be decided upon as follows:

- In cases involving the use of a single Adjudicator, the Senior Executive Director for Student Conduct (or designee), in consultation with the Adjudicator, will determine appropriate Remedies and Sanctions.
- In cases involving the use of a Conduct Standards Board, the Board will recommend Remedies and Sanctions to the Senior Executive Director for Student Conduct (or designee), who will determine appropriate Remedies and Sanctions.

Both Parties will receive simultaneous written notice of a Determination, including any Remedies and Sanctions, within ten (10) days of a hearing.

A. Guidelines for Imposing Remedies and Sanctions

The University will treat Complainants and Respondents equitably by providing Remedies to both Complainants and Respondents, as appropriate, where a Determination of responsibility has been made against the Respondent. Remedies will be designed to restore or preserve equal access to the University's education programs or activities for Complainants, and may include, but are not limited to, the same individualized services described in this Policy as Supportive Measures.

The University will review each case on an individual basis to determine appropriate Remedies and Sanctions. Sanctions may include disciplinary measures imposed upon the Respondent.

In determining appropriate Remedies and Sanctions, the Adjudicator shall consider the following factors:

- the nature and violence of the conduct at issue;
- the impact of the conduct on the Complainant or other appropriate Parties;
- the impact or implications of the conduct on the community or the University;
- prior misconduct by the Respondent, including the Respondent's relevant prior discipline history, both at the University or elsewhere (if known), including criminal convictions;
- whether the Respondent has accepted responsibility for the conduct;
- maintenance of a safe and respectful environment conducive to learning;
- protection of the University community; and,

- any other mitigating, aggravating, or compelling circumstances in order to reach a just and appropriate resolution in each case.

Students found to have violated University policies, rules, regulations, or standards of conduct shall be subject to a range of disciplinary actions. This Policy prohibits a broad range of behaviors, all of which are serious in nature. Depending on the specifics of the incident, more or less severe Sanctions may be imposed. More than one sanction may be imposed for any single violation. Should information come to light that changes the disposition of a case, the Senior Executive Director for Student Conduct (or designee) has the right to reopen the case and to change the prior sanction.

The University may be limited in its ability to issue Remedies and Sanctions in cases where Parties are no longer affiliated with the University, or where the participation of a Party or witness is limited such that it affects the quantity, quality, or kinds of information available in assessing appropriate Remedies and Sanctions.

The University has the right to withhold the issuance of a degree should a student conduct matter either be unresolved or should the Sanctions for a case be incomplete.

Sanctions that may be imposed include, but are not limited to, the following:

Expulsion: Expulsion is permanent termination of student status and exclusion from University premises, privileges, and activities. Tuition and general University fee refunds will be determined in accordance with the University refund policy as approved by the Board of Trustees. In the case of a student organization, the group will lose its official recognition, allocated funding, and all other privileges.

Withdrawal of (rescind) degree: Withdrawal of degree is a permanent disaffiliation between the Student and the University evidenced specifically by the University's decision to rescind a degree already conferred as cited at drexel.edu/provost/policies/withdrawal_degree. Tuition and general University fees will not be refunded.

Withholding of a degree: A student's degree can be withheld and not immediately issued after degree completion if it is determined that withholding the degree is the most appropriate course of action in lieu of suspension or other comparable action.

Suspension: Suspension is a separation of the student from the University for a specified period of time. A suspended student will be withdrawn from all courses and may not attend classes, take exams, receive grades, maintain a position as a co-op student, hold a leadership position, or be on University premises without the authorization of the Vice President for Public Safety, or their designee, throughout the entire duration of the suspension period.

Loss of Privileges: In the case of a student organization, suspension will result in the loss of privileges including, but not limited to, the use of campus facilities, participation in University activities, hosting and/or participating in events with alcohol, use of allocated funds, and sponsorship of official activities. Loss of privileges may also include recruitment and new member activities.

Deferred Suspension: Deferred suspension serves as a final warning to a student that if the student is again found in violation of any University policy, the University is obligated to consider suspension as a primary response.

Loss of housing: A student is involuntarily removed from University housing for a designated period of time. Removal from University housing means the student must properly check out of their room in accordance with existing University procedures within the time constraints established by the Office of Student Conduct. As indicated in the occupancy agreement, the resident will be liable for the full room charge specified if a replacement assignment cannot be made by the Office of University Housing. The sanction conferred by the Office of Student Conduct may stipulate requirements that must be fulfilled for reinstatement into University housing.

Deferred loss of housing: Deferred loss of housing serves as a final warning that any further violation(s) of University policy obligates the University to consider Loss of Housing privileges as a primary response.

Ban from university housing/ban from residence halls: A student is prohibited from entering all or specific residential buildings, including fraternity/sorority properties for a designated period of time.

Housing reassignment: A student is involuntarily reassigned to a new campus location.

Restricted access: The residence hall visitation and guest privileges of the resident Student are revoked for a designated period of time. Additionally, the Student must sign in and out of the building in the Restricted Access Log each time the Student enters or exits the building.

Disciplinary probation: Disciplinary Probation is a specific period of time during which the University provides the student or organization with the opportunity to prove that they will contribute in a positive manner to the University community. Should a student or organization violate University policies while on disciplinary probation, more severe Sanctions shall be imposed. Disciplinary probation will specify any restrictions with which the individual must comply, such as not representing the University in any extra-curricular activity or holding an office in any student group or organization.

Assignment of a constructive/ educational task: A student is required to complete a task that benefits the individual, campus, or community. Examples include, but are not limited to, completing an educational module or class, performing community service, writing reaction or research papers, attending programs or lectures, or other educational Sanctions deemed appropriate by the Office of Student Conduct.

Hold on records: The enforcement of University policies may necessitate a hold on transcripts, grades, diplomas, or other official records pending the resolution of cases.

Restitution: The Student or student organization is required to make monetary reimbursement for repair/replacement of property or service rendered to the University or to other persons, groups, or organizations for specified damages by a date designated by the Office of Student Conduct. These charges may not be in excess of the damage or loss incurred.

Disciplinary reprimand: The Student or student organization is informed that their actions were inappropriate, and that better judgment is to be used in the future

Other Sanctions may be imposed instead of, or in addition to, those specified here. More than one of the Sanctions listed above may be imposed for any single violation.

VII. Appeals

Any Party may appeal a dismissal of a Formal Complaint or any allegations therein, a Threshold Determination made by the Investigator, a Determination made following adjudication, or a Sanction within ten (10) days of receiving written notice thereof. The appeal shall consist of a plain, concise and complete written statement outlining the grounds for appeal and all relevant information to substantiate the basis for the appeal.

Upon receipt of an appeal, the other Party will be notified of the appeal in writing and will be provided five (5) days to respond in writing.

At the discretion of the Title IX Coordinator, or their designee, an appeal may be assigned to either an Appellate Adjudicator or an Appeal Board (collectively, the "Appellate Authority"). In either case, the Title IX Coordinator, or their designee, will ensure that the Appellate Authority is trained, neutral, impartial, and free from conflict, and that the Appellate Authority does not include any previous decision-makers or the Investigator.

The Appellate Authority shall hear appeals on the following grounds. Dissatisfaction with the outcome of the hearing alone is not grounds for appeal.

1. Procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.
4. Unduly harsh sanction: To determine whether the sanction(s) imposed was appropriate for the violation of OED-3 of which the student was found in violation.

Appeals are not intended to be full re-investigations of the allegations. In most cases, appeals are confined to a review of the written documentation or record of the original hearing, and pertinent documentation regarding the grounds for appeal. An appeal is not an opportunity for the Appellate Authority to substitute their judgment for that of the original hearing body, but rather the Appellate Authority may only make changes to the Determination when 1) at least one of the three specified grounds for appeal is established; and 2) a clear error or an abuse of discretion is established.

The Appellate Authority shall, in consultation with the Title IX Coordinator, issue a written decision describing the result of the appeal and the rationale for the result simultaneously to the Parties within ten (10) days of receipt of the opposing Party's response to the appeal. The decision of the Appellate Authority is final.

Procedures for Resolving Reports Against Employees (From OED-3 Appendix B)

Introduction

The University is committed to providing a prompt and equitable response to all reports and Formal Complaints of Prohibited Conduct under the Sexual Harassment and Sexual Misconduct Policy (Policy). The University's resolution processes for addressing Prohibited Conduct are grounded in the principles of support and fairness for all parties, including the provision of procedural protections that ensure notice; equitable opportunity to participate; and neutral and impartial investigation, resolution, and appeal procedures. The definitions for specific forms of Prohibited Conduct and other core concepts are included in [Appendix G – Glossary](#). This resolution process will be used to resolve reports and Formal Complaints of Prohibited Conduct made against Employees.

I. Process Overview

1. Report

Any person may make a Report against any employee for alleged violation(s) of the University's Sexual Harassment and Sexual Misconduct Policy (OED-3). Reports should be referred to the Title IX Coordinator (or OED), who will ensure consistent application of the policy to all individuals and allow the University to respond promptly and equitably to eliminate the prohibited conduct, prevent its recurrence, and address its effects.

2. Initial Assessment

Upon receipt of a Report, the University will conduct an Initial Assessment of the matter and will promptly contact the Complainant and provide information about resources and options, including the process for filing a Formal Complaint and available Supportive Measures. The Complainant will be invited to meet with the Title IX Coordinator, or their designee, to learn more about Supportive Measures and the Formal Resolution Process and to discuss the Complainant's preferences for resolution and Supportive Measures.

During the Initial Assessment, the University will:

- Evaluate whether the alleged conduct falls within the purview this Policy;
- Assess appropriate Supportive Measures; and
- Evaluate the need for any Protective Measures, including administrative leave of a Respondent.

The Initial Assessment will consider the nature of the Report; the safety of the Complainant, any other individual and of the broader campus community; the Complainant's expressed preferences for resolution and Supportive Measures; and the necessity for any Protective Measures, including administrative leave, to protect the safety of the Complainant or the University Community.

3. Preliminary Inquiry

When a Complainant is interested in participating in the University's Formal Resolution Process (to include Investigation and Adjudication or Alternative Resolution), an Investigator will meet with and interview the Complainant. The Investigator will review the information gathered during the interview with the Complainant and will assess whether the alleged conduct, if proved, would constitute a Policy violation. The Investigator will not make credibility determinations in conducting the Preliminary Inquiry.

If the Investigator determines that the reported behavior or conduct, if proved, would not constitute a Policy violation, the University will notify the Complainant and inform the Complainant of other options and resources available at the University or within the community,

as appropriate. If the Investigator determines that the elements of a Policy violation have been raised, the Complainant may file a Formal Complaint.

4. Formal Complaint

Any University Community member may file a Formal Complaint for a violation of this Policy against any employee. In cases where a Complainant does not wish to file a Formal Complaint or in other circumstances, as appropriate, the Title IX Coordinator may, in their discretion, file a Formal Complaint against an employee for a violation of this Policy.

Where the University receives a request to file a Formal Complaint involving allegations that do not constitute Sexual Harassment as defined by the Federal regulations implementing Title IX, the Title IX Coordinator may, in their discretion, determine that it is not appropriate to pursue the Investigation and Adjudication process in certain circumstances and may decide to pursue an Alternative Resolution process as appropriate.

The University will promptly notify all Parties in writing of the filing of the Formal Complaint and will provide the Parties with information about the Investigation and Adjudication process, Alternative Resolution options, and available Supportive Measures. The written notice will include details regarding the alleged Prohibited Conduct, including sufficient details – to the extent known – regarding the nature of the alleged Prohibited Conduct; the identities of the individuals involved; and the date and location of the alleged action(s)/incident(s). Should any of this information be unknown at the time a Formal Complaint is filed, and later becomes known, the University will provide updated written notice, as appropriate. Likewise, if additional allegations that are not included in the original notice provided to the Parties are brought to the attention of the Investigator, the University will provide written notice of the additional allegations to the Parties.

At any time after a Formal Complaint is filed, either Party may request an Alternative Resolution. Each resolution process is guided by the same principles of fairness and respect for all Parties. Supportive Measures are available for all Parties, whether as Complainants or Respondents, to provide support and guidance throughout any process under OED-3. All Respondents will be presumed “not responsible” until a Determination is reached.

Dismissal of Formal Complaint

The Title IX Coordinator will determine whether the conduct alleged in the Formal Complaint falls within the scope of the policy and the definitions of Prohibited Conduct. The Title IX regulations require the University to dismiss some or all of the allegations in the Formal Complaint related to Title IX Sexual Harassment if: 1) the conduct alleged, even if substantiated, would not constitute Title IX Sexual Harassment as defined in the Title IX regulations; 2) the conduct did not occur within the University’s education program or activity; or, 3) the conduct did not occur against a person in the United States. This means that the University may be required by law to dismiss some or all of the allegations in the Formal Complaint under Title IX and provide the parties notice of the dismissal and the opportunity to appeal that dismissal.

In the event of a mandatory dismissal required by the Title IX regulations, a matter may still proceed through the University’s Formal Resolution Process, so long as the remaining allegations set forth in the Formal Complaint, if proved, would constitute violations of this Policy.

In addition, the Title IX Coordinator may dismiss a Formal Complaint, at any stage of the process, in any of the following three circumstances:

1. The Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;
2. The Respondent is no longer enrolled or employed by the University; or
3. Specific circumstances, including a Complainant's decision not to respond to outreach by the Title IX Coordinator, prevent the University from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein.

The decision about whether to dismiss a Formal Complaint, in whole or in part, may be made at any time in the process and will be communicated to all parties in writing. Either party may appeal the decision to dismiss the Formal Complaint to [decision-maker].

Dismissal of the Formal Complaint will be communicated to the parties simultaneously and in writing. Either party may challenge the dismissal of a formal complaint by notifying the Title IX Coordinator in writing of the challenge within five (5) business days of the decision being communicated. The other party will be notified of the challenge. Challenges to dismissals will be review by [decision maker] within [x] days.

Title IX Coordinator Discretion to File a Formal Complaint

The Title IX Coordinator also has the discretion to file a Formal Complaint. In evaluating the appropriate manner of resolution, including whether the Title IX Coordinator will file a Formal Complaint in the absence of a formal complaint by the Complainant, the Title IX Coordinator will consider the following factors: The totality of the known circumstances;

- The nature and scope of the alleged conduct, including whether the reported behavior involves the use of a weapon;
- The respective ages and roles of the Complainant and Respondent;
- The risk posed to any individual or to the campus community by not proceeding, including the risk of additional violence;
- Whether there have been other reports of other prohibited conduct or other misconduct by the Respondent;
- Whether the report reveals a pattern of misconduct related to Prohibited Conduct (e.g., illicit use of drugs or alcohol) at a given location or by a particular group;
- The Complainant's interest in the University not pursuing an investigation or disciplinary action and the impact of such actions on the Complainant;
- Whether the University possesses other means to obtain relevant evidence;
- Fairness considerations for both the Complainant and the Respondent;
- The University's obligation to provide a safe and non-discriminatory environment; and
- Any other available and relevant information.

The Title IX Coordinator may also re-open a report under this policy if any new or additional information becomes available, and/or if the Complainant later decides that they would like a formal resolution to occur.

In those instances when the Title IX Coordinator files a Formal Complaint, the Title IX Coordinator will notify the Complainant that the University intends to initiate an investigation. The Complainant is not required to participate in the investigation or in any of the actions taken by the University.

The University's ability to investigate and respond fully to a report may be limited if the Complainant requests anonymity or declines to participate in an investigation. The University will, however, pursue other steps to limit the effects of the reported conduct and prevent its recurrence. In all cases, the final decision on whether, how and to what extent the University will conduct an investigation will be taken in connection with a report of Prohibited Conduct will be made in a manner consistent with this policy.

II. Notice of Allegations

The University will promptly notify all parties in writing of the filing of the Formal Complaint and will provide the parties with information about the Investigation and Adjudication Process, Alternative Resolution options, and available Supportive Measures. The written notice will include:

- Information regarding the alleged Prohibited Conduct, including sufficient details – to the extent known – regarding the nature of the alleged Prohibited Conduct; the identities of the individuals involved; and the date and location of the alleged action(s)/incident(s). Should any of this information be unknown at the time a Formal Complaint is filed, and later become known, the University will provide updated written notice, as appropriate. Likewise, if additional allegations that are not included in the original notice provided to the parties are brought to the attention of the Investigator, the University will provide notice of the additional allegations to the parties.
- Notice of the University's resolution processes;
- A statement that the Respondent is presumed not responsible for alleged Prohibited Conduct and that a determination regarding responsibility will be made at the conclusion of the Investigation and Adjudication process;
- Advisement that a party may have an Advisor of their choice who may be, but is not required to be, an attorney and who may inspect and review evidence in the Investigation; and
- That knowingly making false statements or knowingly submitting false information during the Formal Resolution processes is prohibited under this Policy and the Student Code of Conduct.

At any time after a Formal Complaint is filed, either party may request an Alternative Resolution. Each resolution process is guided by the same principles of fairness and respect for all parties.

All Respondents will be presumed "not responsible" until a Determination is reached.

Advisors

The Complainant and Respondent may each have an Advisor of their choice present with them at any hearing, meeting, or interview. The Advisor may be, but is not required to be, an attorney. If a Party does not have an Advisor at the time of a hearing, the University will provide the Party with an Advisor. An Advisor may conduct relevant cross-examination during a hearing. The Advisor may not provide opening or closing remarks during a hearing and may not speak on behalf of a Party during any hearing, meeting, or interview conducted under this Policy.

Advisors are expected to maintain the privacy of any records shared with them during the course of any process under this Policy, and to not share information obtained during any Investigation or Adjudication outside of their role as an Advisor.

III. Alternative Resolution

Upon the filing of a Formal Complaint, the Complainant or the Respondent may request an Alternative Resolution. Participation in any Alternative Resolution processes must be voluntary and mutual, and may begin only after both Parties provide voluntary, informed, written consent to attempt Alternative Resolution.

The University reserves discretion in determining whether any given case is appropriate for Alternative resolution. Alternative Resolution is not available in cases of alleged sexual harassment of a student by a University employee, and may be deemed inappropriate in other cases that include, for example: allegations of Prohibited Conduct involving penetrative acts; allegations of significant violence or threats of violence; instances in which the circumstances of the alleged Prohibited Conduct give rise to concerns that the Alternative Resolution process might be used to abuse, harass, intimidate, or manipulate a Party; or where the University has received more than one Report or Formal Complaint of Prohibited Conduct against the same Respondent under this Policy.

Alternative Resolution may encompass a broad range of conflict resolution strategies, including but not limited to a facilitated discussion between the parties, with the assistance of the Title IX Coordinator or their designee; formal mediation between the parties, conducted by the Title IX Coordinator or a trained designee; or targeted or broad-based educational programming or training. Both Parties will be provided with written notice disclosing the requirements of the Alternative Resolution process, including the right to withdraw from the process at any time prior to Final Resolution; any consequences resulting from participating in the Alternative Resolution process; the circumstances under which the Parties are precluded from requesting to resume the Investigation and Adjudication process with regard to the same allegations; and the records that will be maintained or could be shared as a result of participation in the process.

The Alternative Resolution process may be made available to the Parties at any point prior to a final Determination in the matter. The University will not compel a Complainant or a Respondent to engage in any form of Alternative Resolution. Participation in Alternative Resolution is voluntary at all times, and either Party can withdraw from the Alternative Resolution process and resume the Investigation and Adjudication process at any point prior to Final Resolution of the matter. Any notes taken or information disclosed during an Alternative Resolution Process will not be shared or used outside of the Process, except to the extent that they may be relevant or directly related to a subsequent Investigation and Adjudication conducted under this Policy, as required by the applicable federal regulations.

Alternative Resolution, even if requested, will not be used in cases involving allegations that an employee sexually harassed a student.

If the Parties reach an agreement during the Alternative Resolution process, they will be asked to sign a written agreement, or Final Resolution, outlining the terms of the agreement. The Final Resolution indicates the conclusion of the Alternative Resolution process and will be maintained by the Office of Equality and Diversity for the sole purpose of ensuring the agreement terms are upheld and met and any supportive services, remedies and/or sanction(s) agreed upon are upheld by the Parties, as appropriate. After a matter has reached Final Resolution, the same matter cannot proceed through the Investigation and Adjudication process.

Alternative Resolution processes will typically be completed within sixty (60) days. The time frame may be extended for good cause to accommodate the availability of the Parties, to provide reasonable

accommodations, to address University breaks or vacations, or for other legitimate reasons. Any extension of the time frame, and the reason for the extension, will be shared with the Parties in writing.

IV. Investigation

A. Time Frame

The Investigation and Adjudication process will typically be completed within one hundred and twenty (120) days of the filing of the complaint, although the complexity of a report or other factors may require a longer time frame. The time frame may be extended for good cause to ensure the integrity and completeness of the Investigation, to accommodate the availability of witnesses, to provide reasonable accommodations, to address University breaks or vacations, or other legitimate reasons. In cases where there is a concurrent law enforcement investigation, the University may temporarily delay the investigation as appropriate, which may result in the time frame being extended. Any extension of the timeframes, and the reason for the extension, will be shared with the Parties in writing.

B. Consolidation of Multiple Formal Complaints

The Title IX Coordinator, or their designee, has the discretion to consolidate multiple Formal Complaints against more than one Respondent, by more than one Complainant against one or more Respondents, or by one Party against the other Party, into one investigation if the allegations arise out of similar facts or circumstances. In deciding whether to consolidate multiple Formal Complaints into a single investigation, the Title IX Coordinator will consider whether the evidence related to each Formal Complaint would be relevant in reaching a Determination with respect to the others.

C. Investigator

As described in OED-3, the University, through the Title IX Coordinator, will designate an Investigator, or Investigators, of its choosing. Any Investigator used by the University, whether internal or external, must have specific training and experience investigating allegations of sexual harassment and sexual misconduct. The Investigation will be fair, impartial, and thorough, and all Parties and witnesses will be treated with the appropriate sensitivity and respect. All Respondents will be presumed “not responsible” until a Determination is reached.

D. Participation of the Parties

Complainants and Respondents are encouraged, but never pressured, to participate in the University’s Investigation and Adjudication process so that the facts of each Report can be explored, and responsible Parties held accountable for their misconduct, if warranted. The University will make multiple good faith attempts to contact the Parties to encourage their participation in the Investigation and Adjudication process. If a Party is unresponsive to multiple good faith attempts to contact them, the Investigator will conduct the Investigation without the participation of the Party. A Party who elects not to participate in any one phase of an investigation will still be notified of any progress or developments in the Investigation and Adjudication process as they occur, and will be provided with an opportunity to participate in subsequent phases of the process.

If a Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw a Formal Complaint, or any allegations therein, the University will make every reasonable effort to comply with that request. As explained more fully in OED-3, there may be exceptional circumstances when the University decides to proceed with the Investigation and Adjudication process despite the request of a Complainant. The Complainant, however, will not be required to participate in the process.

E. Investigation Process

The first step of an Investigation will usually be a preliminary interview of the Complainant by the Investigator. The Investigator will then coordinate the gathering of information from the Complainant, the Respondent, and any other individuals who may have information relevant to the Determination. Before any interview with a Party, the Investigator will provide to the Party a written notice of the date, time, location, participants and purpose of the interview and will allow sufficient time for the Party to prepare for the interviews. Both Parties will have an equal opportunity to provide the Investigator with evidence that is directly related to the allegations, whether inculpatory or exculpatory, and the names of possible witnesses, including expert witnesses.

The Investigator is obligated to collect all evidence directly related to the allegations, whether or not the evidence is ultimately deemed relevant and included in the Investigative Report. The Investigator will gather any available physical or medical evidence, including documents, communications between the Parties, and other electronic records, to the extent they are directly related to the allegations.

The Investigator will gather prior or subsequent relevant allegations of, or Determinations of responsibility for, misconduct by the Respondent. Evidence of an occurrence or occurrences of sexual or other relevant behavior that establishes a pattern of conduct, establishes identity, motive, intent or opportunity may be admissible during the Investigation and Adjudication process. Evidence of a pattern of similar conduct, either before or after the conduct in question, regardless of whether there has been a prior Determination of a policy violation, may be admissible. Information or evidence that relevant evidence was destroyed is admissible and may be considered in assessing the credibility of the Parties and the weight of the evidence.

At the conclusion of the fact gathering phase of the Investigation, the Investigator will prepare an Investigative Report that fairly summarizes the relevant evidence.

F. Inspection of Evidence and Review of Investigative Report

Upon the conclusion of an Investigation, the Parties will be given an opportunity to inspect and review a draft Investigative Report and any evidence obtained as part of the Investigation that is directly related to the allegations raised in the Formal Complaint. Upon receiving the draft Investigative Report and evidence, the Parties will have ten (10) days to submit a written response, including any additional information or comment or request that additional investigative steps be taken. At the conclusion of the 10-day period, the Investigator will review any responses received from the parties, and will conduct any additional investigative steps, as needed, before completing a final Investigative Report.

G. Statement on Relevance

“Relevant” evidence and questions refer to any questions and evidence that tend to make an allegation of sexual harassment or misconduct more or less likely to be true. Relevant evidence includes both inculpatory and exculpatory evidence. Not all evidence gathered by the Investigator that is directly related to the allegations in the Formal Complaint will be considered relevant – including, for example, information that is privileged but for which the individual holding the privilege has not submitted a written waiver; or prior sexual history of a Complainant, unless offered to demonstrate consent or that someone other than Respondent committed the alleged Prohibited Conduct. The Investigator will determine the relevancy of evidence for inclusion in an Investigative Report.

Relevant evidence and questions do not include the following types of evidence and questions, which are deemed “irrelevant” at all stages of the Investigation and Adjudication process:

- Evidence and questions that constitute, or seek disclosure of, information protected under a legally recognized privilege, including medical, psychological or similar records, unless the person holding such privilege has waived the privilege by providing voluntary, written consent; and
- Evidence and questions about the Complainant's sexual predisposition or prior sexual behavior unless:
 - They are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or
 - They concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.
 -

H. Threshold Determination

After considering and incorporating any additional relevant information or comments made by the Parties, the Investigator, in consultation with the Title IX Coordinator, will make a Threshold Determination as to whether the elements of a Policy violation have been sufficiently raised to proceed to Adjudication. In reaching a Threshold Determination, the Investigator may consider:

- 1) whether the Prohibited Conduct alleged in the Formal Complaint, if assumed to be true, would constitute a violation of OED-3; and
- 2) whether a reasonable person could conclude, based on the information gathered in the Investigation, that a violation of OED-3 had occurred.

Upon the conclusion of an Investigation, both Parties will be advised in writing of the Investigator's Threshold Determination. If the Threshold Determination is that the elements of a Policy violation have not been raised, or that a reasonable person could not conclude, based on the information gathered in the Investigative Report, that a Policy violation occurred, either Party may appeal the Threshold Determination under the Appeals procedures set forth in this Appendix (See Section VI).

If it is determined that the elements of a Policy violation have been raised or that a reasonable person could conclude, based on the information gathered in the Investigation, that a Policy violation occurred, each Party will be given an opportunity to submit written information for consideration in determining appropriate Remedies and Sanctions, should the Respondent be found responsible for the alleged Prohibited Conduct during any subsequent Adjudication process. A Complainant may submit an impact statement, and a Respondent may submit a mitigation statement. These statements will be considered as part of the sanctioning process only, and will not be made available to any Adjudicator(s) until or unless a Respondent has been determined to be responsible for alleged Prohibited Conduct.

In addition, if the Threshold Determination is that the elements of a Policy violation have been raised, or that a reasonable person could conclude, based on the information gathered in the Investigation, that a Policy violation occurred, the Title IX Coordinator will meet with each Party to discuss next steps in the process.

V. Adjudication

If the determination has been made that the elements of a Policy violation have been raised, or that a reasonable person could conclude, based on the information gathered in the Investigation, that a Policy violation occurred, the Title IX Coordinator and a representative from Human Resources will meet with each Party to discuss next steps. During this meeting, the Respondent may either request a hearing or accept responsibility for violating this Policy.

A. Acceptance of Responsibility

Upon meeting with the Title IX Coordinator, the Respondent may choose not to contest the allegations and give up the right to a hearing by accepting responsibility for committing a Policy violation. If a Respondent accepts responsibility, the Complainant will be notified in writing, and both Parties will have the opportunity to submit written information for consideration by the Title IX Coordinator, a representative from Human Resources, the Respondent's supervisor and/or other appropriate administrators with oversight over the relevant unit. A Complainant may submit an impact statement, and a Respondent may submit a mitigation statement.

The Office of Human Resources, in consultation with the Title IX Coordinator, will impose appropriate Remedies and Sanctions (see below for guidelines and list of permissible Sanctions). The Complainant and Respondent will be simultaneously notified of the Remedies and Sanctions and rationale therefor in writing, and this decision may only be appealed by both Parties based on Severity of Sanction. If there is no appeal by either Party, the Remedies and Sanctions imposed by the Office of Human Resources will be final.

B. Choice of Adjudicator

In advance of a hearing, the Title IX Coordinator shall designate an Adjudicator, whether internal or external to the University, who is trained, neutral, impartial, and free from conflict. In designating an Adjudicator, the Title IX Coordinator will consider, among other factors, the nature of the allegations, the complexity of the facts, whether there is any issue of conflict of interest, the availability of trained internal Adjudicators, whether the University is in session or on break, or any other relevant factors.

The Adjudicator will be supported by the Title IX Coordinator, or their designee, and a designee of the Office of Human Resources, who will be present during the hearing to serve as a resource for the Adjudicator on issues of policy and procedure, and to assure that policy and procedure are appropriately followed throughout the hearing.

C. Hearing Procedures

The Complainant, Respondent, Advisors and witnesses will be notified in writing as to the time, date, and location of the hearing, as well as the identity of the Adjudicator(s) assigned to their case. Either party may challenge or object to the assignment of any Adjudicator on the basis of a conflict or bias. Challenges to Adjudicator assignments must be made in writing to the Title IX Coordinator at least six (6) days prior to a hearing, in order to provide an opportunity for an alternate Adjudicator to be identified without causing a delay in the hearing process. Hearings are not open to the public.

The Title IX Coordinator, or their designee, will provide the Investigative Report to the designated Adjudicator at least five (5) days prior to the hearing. The Complainant, the Respondent, and their Advisors will be provided with the Investigative Report, for their review, at least ten (10) days prior to the hearing.

The Parties are required to inform the Title IX Coordinator, or their designee, of their Advisor of choice who will attend the hearing at least five (5) days in advance of the hearing. If a Complainant or Respondent notifies the Title IX Coordinator, or their designee, that they do not have an Advisor for the hearing, the University may reschedule the hearing and will provide the Party with an Advisor to conduct cross-examination on their behalf at the hearing. The Title IX Coordinator, or their designee, may reschedule the hearing to ensure that the Advisor has adequate time to prepare for the hearing.

Unless the Complainant or Respondent has declined to participate in the Investigation and Adjudication process, both the Complainant and Respondent will be expected to appear before the Adjudicator. The Complainant and the Respondent may appear at the live hearing, in person or virtually through a remote electronic method.

There will be a single verbatim audio recording of all hearings before the Adjudicator, which will be the sole property of Drexel University. In the event of an appeal, the recording will be made available to the Parties for inspection and review upon request. This recording will be maintained for a period of seven (7) years.

The general hearing procedure is as follows:

- Introductions of all attendees
- Overview of investigation by Investigator
- Questions posed to Investigator by Advisors and Adjudicator
- Brief introductory remarks from the Complainant
- Brief introductory remarks from the Respondent
- Questions posed to Complainant by Respondent's Advisor and Adjudicator
- Questions posed to Respondent by Complainant's Advisor and Adjudicator
- Questions posed to Complainant's Witnesses by Respondent's Advisor and Adjudicator
- Questions posed to Respondent's Witnesses by Complainant's Advisor and Adjudicator
- Short recess
- Brief concluding remarks by Complainant
- Brief concluding remarks by Respondent

The hearing procedure may depart from this general order, depending on the circumstances of each case, but in no instance will either Party be deprived of an opportunity to observe substantive portions of the hearing; to ask or answer questions to or from the other Parties, witnesses, or the Adjudicator; or to provide introductory or concluding remarks.

D. Cross-Examination

During the hearing, each Party's Advisor may ask the other Party and any witnesses relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the Party's Advisor and never by a Party personally. The Parties may not question each other or other witnesses directly but may raise questions to be asked of the other Party and witnesses through their Advisor.

Before any Party or witness answers a cross-examination or other question, the Adjudicator must first determine whether the question is relevant and explain any decision to exclude a question as irrelevant. The Adjudicator may consult with the Title IX Coordinator or designee regarding any questions posed. If the Adjudicator determines that a question is irrelevant, the Party or witness to whom the question was posed will be directed not to answer the question.

Examples of irrelevant information that may be excluded include, but are not limited to, information protected by a legally recognized privilege; evidence about a Complainant's prior sexual history; and Party or witness statements that have not been subjected to cross-examination at the hearing.

If a Party or witness does not submit to cross-examination at the hearing, the Adjudicator must not rely on any prior statement, either written or oral, of that Party or witness in reaching a Determination; provided however that the Adjudicator cannot draw an inference about the Determination based solely on a Party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.

A Party's Advisor may appear and conduct cross-examination even when the Party who they are advising does not appear. Similarly, where one Party does not appear and that Party's Advisor of choice does not appear, the University will designate an Advisor to cross-examine the other, appearing Party on behalf of the non-appearing Party, resulting in consideration of the appearing Party's statements but not the non-appearing Party's statements.

Following cross-examination of the Parties and witnesses by Advisors, the Adjudicator may ask questions of the Parties and witnesses to seek relevant evidence and to follow up on questions asked by the Advisors.

VI. Determination

The Adjudicator will objectively evaluate all relevant evidence and will reach a Determination based upon a preponderance of the evidence standard. Once the Adjudicator reaches a Determination, both Parties will be simultaneously notified in writing of the outcome, including any Remedies or Sanctions being levied in connection with the Determination.

If the Determination has been made that a policy violation has occurred, the Title IX Coordinator will coordinate any Remedies and Sanctions with Human Resources and the Respondent's supervisor and/or other appropriate administrators with oversight over the relevant unit.

If a faculty member is found by OED to have violated this Policy, the Dean of the College, School, or Center and the Department Head in which the faculty member has their primary appointment, in consultation with Human Resources, will determine the appropriate Remedies and Sanctions, which may include disciplinary action, to address the violation and to prevent its reoccurrence. The Dean of the relevant College, School, or Center may also consult with the Provost, as needed.

A. Guidelines for Imposing Remedies and Sanctions

The University will treat Complainants and Respondents equitably by providing Remedies to both Complainants and Respondents, as appropriate, where a Determination of responsibility has been made against the Respondent. Remedies and Sanctions will be designed to restore or preserve equal access to the University's education programs, employment opportunities, or activities for Complainants, and may include, but are not limited to, the same individualized services described in this Policy as Supportive Measures.

Remedies and Sanctions also include disciplinary measures. The University considers the disciplinary measures listed below to be guidelines when addressing Sexual Harassment and Misconduct Policy violations. Each incident is reviewed on an individual basis.

In determining the appropriate Remedies and Sanctions, the University shall consider the following factors:

- the nature and violence of the conduct at issue;
- the impact of the conduct on the Complainant or other appropriate Parties;
- the impact or implications of the conduct on the community or the University;
- prior misconduct by the Respondent, including the Respondent's relevant prior discipline history, both at the University or elsewhere (if known), including criminal convictions;
- whether the Respondent has accepted responsibility for the conduct;

- maintenance of a safe and respectful educational and employment environment;
- protection of the University community; and
- any other mitigating, aggravating, or compelling circumstances in order to reach a just and appropriate resolution in each case.

Disciplinary measures that may be imposed under University policy include:

- **Warning:** Notice, in writing, that continuation or repetition of prohibited conduct may be cause for additional disciplinary action.
- **Educational/Training Requirements:** Completion of training, projects, programs, or requirements designed to help the employee manage behavior and understand why it was inappropriate. Includes appropriate and relevant community service opportunities.
- **Formal Performance Improvement Plan:** see Performance Improvement Process Policy, H.R. 43.
- **Restitution:** Repayment to the University or to an affected Party for damages resulting from the policy violation.
- **Suspension:** Exclusion from University premises, attending classes, and other privileges or activities for a specified period of time, as set forth in the suspension notice. Notice of this action will remain in the employee's file. Conditions for return to work may be specified in the suspension notice.
- **Termination:** Permanent termination of employment status and exclusion from University premises, privileges, and activities. This action will be permanently recorded in the employee's file.

Other disciplinary measures may be imposed instead of, or in addition to, those specified here. More than one of the disciplinary measures listed above may be imposed for any single violation. The University may be limited in its ability to issue disciplinary measures in cases where the Respondent is no longer affiliated with the University.

VII. Appeals

Any Party may appeal a dismissal of a Formal Complaint or any allegations therein, a Threshold Determination made by the Investigator, a Determination made following adjudication, or a Sanction within ten (10) days of receiving written notice thereof. The appeal shall consist of a plain, concise and complete written statement outlining the grounds for appeal and all relevant information to substantiate the basis for the appeal.

Upon receipt of an appeal, the other Party will be notified of the appeal in writing and will be provided five (5) days to respond in writing.

At the discretion of the Title IX Coordinator, or their designee, an appeal may be assigned to either an Appellate External Adjudicator or a senior University administrator (collectively, the "Appellate Authority"). In either case, the Title IX Coordinator, or their designee, will ensure that the Appellate Authority is trained, neutral, impartial, and free from conflict, and that the Appellate Authority does not include any previous decision-makers or the Investigator.

The Appellate Authority shall hear appeals on the following grounds. Dissatisfaction with the outcome of the hearing alone is not grounds for appeal.

1. Procedural irregularity that affected the outcome of the matter;

2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Appeals are not intended to be full re-investigations of the allegations. In most cases, appeals are confined to a review of the written documentation or record of the original hearing, and pertinent documentation regarding the grounds for appeal. An appeal is not an opportunity for the Appellate Authority to substitute their judgment for that of the original Adjudicator, but rather the Appellate Authority may only make changes to the Determination when 1) at least one of the four specified grounds for appeal is established; and 2) a clear error or an abuse of discretion is established.

The Appellate Authority shall, in consultation with the Title IX Coordinator, issue a written decision describing the result of the appeal and the rationale for the result simultaneously to the Parties, within ten (10) days of receipt of the appeal. The decision of the Appellate Authority is final.

Written explanation of student's or employee's rights and options

When a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, the University will provide the student or employee a written explanation of the student's or employee's rights and options including:

- Importance of preserving evidence
- How and to whom the offense should be reported
- Options about involvement of law enforcement and campus authorities
 - Option to notify proper law enforcement authorities, including on-campus and local police
 - Be assisted by campus authorities in notifying law enforcement if the victim so chooses
 - Decline to notify such authorities
 - Where applicable, the rights of victims and institution's responsibilities for orders of protection, no contact orders, restraining orders or similar lawful orders issued by a criminal, civil, or tribal court or by the institution
- Information about how the institution will protect the confidentiality of victims and other necessary parties
 - Within publicly available recordkeeping
 - When implementing accommodations/protective measures
- Options for, available assistance in, and how to request changes to
 - Academic situations
 - Living situations
 - Transportation situations
 - Working situations
 - Protective measures

Disclosures to Alleged Victims of Crimes of Violence of Non-forcible Sex Offenses

Drexel University will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the college against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, Drexel University will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Megan's Law Website

Pennsylvania's legislature has determined that public safety will be enhanced by making information about registered sex offenders available to the public through the internet. Knowledge whether a person is a registered sex offender could be a significant factor in protecting individuals and family members or those in care of a group or community organization, from recidivist acts by registered sex offenders. The technology afforded by the Internet makes information on registered sex offenders readily accessible to the public, enabling them to undertake appropriate precautions to prevent or avoid placing potential victims at risk. Public access to information about registered sex offenders is intended solely as a means of public protection. The Megan's Law website is available at

<http://www.pameganslaw.state.pa.us>

Missing Student Reporting Procedure

Drexel University has established the following procedure to assist in the reporting and location of students reported as missing.

The Higher Education Opportunity Act of 2008 requires that certain universities establish a missing student policy for students residing in on-campus housing. To this policy, a missing person will be considered anyone, whose whereabouts are unknown, whatever the circumstances of disappearance. They will be considered missing until located and their well-being established.

Students living in an on-campus student housing facility have the option to register a confidential contact person to be notified in the event that a student over the age of 18 years is determined to be missing. Only authorized campus officials and law enforcement officers in furtherance of a missing person investigation may have access to this information. Students who want to register a contact person for this purpose can do so by logging into their DrexelOne account, and selecting the "Update Housing Emergency Contact" link, which can be found by selecting the "More BannerWeb Student Services" link under the "Grades, Transcripts and Records" menu.

A student shall be deemed missing when someone has a concern regarding the safety and security of a student whose whereabouts are unknown or unexplainable.

Reports of missing students must be directed to the Department of Public Safety, which has the responsibility and authority to investigate each report and determine whether the student is missing.

If you suspect that a student may be missing, contact the Department of Public Safety immediately at 215.895.2222.

When reporting a missing person, be prepared to provide the following information:

- Your name and contact information;
- Name of missing student;

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- Any/all contact information for the student;
- Time and date last seen;
- Location last seen;
- Last known destination;
- Names of acquaintances; and
- Any additional information that may be important in helping to locate the missing person.

If the Drexel University Police Department's investigation determines that a student for whom a report has been filed is missing, they will notify the Philadelphia Police Department (PPD) within 24 hours and work in conjunction with the PPD to determine the whereabouts of the student. If the student is determined to have been missing for more than 24 hours, the Dean of Students and the Vice President of Public Safety or their designees will determine how best to make contact with the listed emergency contact.

If the missing student is under the age of 18, the University is required to contact the missing student's parent[s] or guardian.

REPORTABLE GEOGRAPHIC LOCATIONS

The Clery Act requires that Drexel University disclose statistics for offenses committed in certain specific geographic locations. To assist in the understanding of reportable locations, maps are provided at drexel.edu/publicsafety/policing-security/overview/ for each of the campuses.

The specific locations are defined as follows:

On Campus

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by Drexel University in direct support of, or in a manner related to, Drexel University's educational purposes, including residence halls.

In addition, any building or property that is within or reasonably contiguous to buildings or property described in the above paragraph, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

Residence Halls and Fraternities

Considered a subset of the "on-campus" category, the number of crimes reported for residence halls or other residential facilities must be less than or equal to the number of reported crimes for the on-campus category.

Non-campus Building or Property

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

On Public Property

All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus. This includes the sidewalk across the street but does not include property beyond the sidewalk.

DEFINITIONS OF CRIMINAL OFFENSES

Crime Categories

All reported crimes are categorized in accordance with Uniform Crime reporting requirements established by the Federal Bureau of Investigation (FBI). The Uniform Crime Reporting Handbook located at [fbi.gov/about-us/cjis/ucr/additional-ucr-publications/ucr_handbook.pdf](https://www.fbi.gov/about-us/cjis/ucr/additional-ucr-publications/ucr_handbook.pdf) [PDF] contains definitions and classifications for all crime categories.

Criminal Homicide

Murder and Non-Negligent Manslaughter is defined as the willful (non-negligent) killing of one human being by another.

Negligent Manslaughter is defined as the killing of another person through gross negligence.

Sex Offenses

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

Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.

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

Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Robbery

The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and /or by putting the victim in fear.

Aggravated Assault

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

Burglary

The unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft

The theft or attempted theft of a motor vehicle.

Arson

Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

Hate Crimes

The law requires the release of statistics by category of prejudice concerning the occurrence of hate crimes in the crime classifications listed in the preceding section and for other crimes involving bodily

injury to any person in which the victim is selected because of the actual or perceived race, gender, religion, national origin, sexual orientation, gender identity, ethnicity, or disability of the victim.

In August of 2008, HEOA S 488, 20 U.S.C. S 1092 (f) (1) F (ii) modified the above hate crimes to include the following additional crimes under the hate crime category:

Larceny Theft

The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession, of another.

Threats Intimidation (Includes Stalking)

To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Vandalism

To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Simple Assault

An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggrieved bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Arrests or Disciplinary Referrals

The Clery Act requires institutions to disclose both the number of arrests and the number of persons referred for disciplinary action for illegal weapons possession, drug law violations and liquor law violations.

Weapons Violations:

The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

Drug Abuse Violations:

The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

Liquor Law Violations:

The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Violence Against Women Reauthorization Act of 2013 (VAWA) Crimes

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

- dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse; and
- dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence is defined as a felony or misdemeanor crime of violence committed:

- by a current or former spouse or intimate partner of the victim;
- by a person with whom the victim shares a child in common;
- by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; and/or
- by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

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

- fear for the person's safety or the safety of others; or
- suffer substantial emotional distress.

Sexual Assault is defined as an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's UCR program and included in Appendix A of 34 CFR Part 668.

Crimes Involving Juveniles

A juvenile is anyone under the age of 18 years. Due to the seriousness of crimes involving juveniles there is an added duty of care. You must immediately report any and all incidents involving juveniles to the Drexel University Police Department at 215.895.2222 or Philadelphia Police at 911. Additional information regarding protection of minors and reporting child abuse can be found in [the PROTECTION OF MINORS AND REPORTING CHILD ABUSE Policy HR-73](#).

Victim Services Coordinator

The Drexel Public Safety victim services coordinator is available to assist with referrals to crisis/counseling centers and guide victims through the criminal justice system. The Victim Service Coordinator will work collaboratively with and serve as a liaison between the Drexel University Police Department, the Philadelphia Police Department, the Philadelphia District Attorney's Office and the Office of Equality and Diversity/Title IX offices concerning to the victim. You can reach the Victim Services Coordinator by calling 215.895.6921 or via or email at als528@drexel.edu

CAMPUS INCIDENTS – DISSEMINATION OF INFORMATION

The Department of Public Safety works directly with the Philadelphia Police Department, other law enforcement agencies, businesses, and academic institutions to share information related to crimes that impact our campuses and the surrounding communities. The sharing of information allows the Department of Public Safety to provide the students, faculty and professional staff with information that allows individuals to make informed decisions while on campus or traveling in the surrounding communities.

Daily Crime Log

The Department of Public Safety maintains a daily crime log of all incidents in the Public Safety Office located at 3201 Arch Street, Suite 350, during normal business hours. An online version of the daily crime log is available at drexel.edu/publicsafety/crime-reports-prevention/crime-log/. In order to provide the Drexel University Community with the most accurate information available, the crime log notes how each incident is classified related to the reporting requirements under state and federal laws.

Colleges and universities that maintain a police or security department are required to disclose in the public crime log any crime that occurred on campus or within the patrol jurisdiction of the campus police or the campus security department and is reported to the campus police or security department. The log is required to include the nature, date, time, and general location of each crime as well as its disposition, if known. Incidents are to be included within two (2) business days, but certain limited information may be withheld to protect victim confidentiality, ensure the integrity of an ongoing investigation or to keep a suspect from fleeing. Only the most limited information necessary may be withheld, and even then, it must be released once the adverse effect is no longer likely to occur. The log must be publicly available during normal business hours. Students, employees, and the general public, such as parents or members of the local press, may access the crime log. Logs remain open for 60 days and subsequently must be available within two (2) business days of a request. Please visit drexel.edu/publicsafety for the daily updated information related to campus crime.

Student Newspaper

The Department of Public Safety provides a summary of incidents and a copy of the daily crime log to the editing staff of the student-run newspaper, *The Triangle*. *The Triangle* publishes a summary of campus and community incidents during the regularly published edition of the paper.

UNIVERSITY POLICY ON REPORTING CRIMINAL INCIDENTS TO STATE & LOCAL POLICE

The Department of Public Safety collects and analyzes past and current crime data and processes them using established methodologies and advanced technology. The information is then used to determine patterns of criminal activity so Drexel Public Safety can quickly react by effectively allocating resources and, when warranted, make timely notifications. The data are also used to strategically coordinate deployment and appropriately respond with other law enforcement and public safety entities including the Philadelphia and University of Pennsylvania Police Departments.

PENNSYLVANIA CRIMES CODE

Drexel University is mandated by [Pennsylvania Crimes Codes Section 33.111](#) to disclose crime statistics. “Each institution of higher education shall annually report crime statistics and rates to the State Police in the form and manner required by the State Police, for publication in the Pennsylvania uniform crime report, Crime in Pennsylvania.”

UNIVERSITY POLICY ON POSSESSION AND USE OF WEAPONS

No student, faculty, professional staff or visitor shall keep, use, possess, display or transport any rifles, shotguns, handguns, pellet or BB guns, dangerous knives, billy clubs, makeshift weapons, martial arts weapons or any other lethal or dangerous devices capable of casting a projectile by air, gas, explosion, or mechanical means on any property or in any building owned or operated by the University, or in any vehicle on campus. Realistic facsimiles of weapons are also specifically not allowed.

The Executive Vice President, Treasurer, and Chief Operating Officer and the Vice President for Public Safety have the authority to permit the use and possession of weapons on campus by recognized law enforcement officials.

The Drexel **Reserve Officers’ Training Corps (ROTC)** is authorized to store, transport in a secured manner, and use firearms only in designated areas approved by the ROTC program when performing functions associated with their official duties.

DREXEL UNIVERSITY – CLERY ACT STATISTICS

University City Campus

University City Campus							
Crime Classification	Year	On Campus		Non Campus	Public Property	Total	Unfounded
		On Campus Residential	On Campus Total				
Murder/Non-negligent manslaughter	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Negligent manslaughter	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Sex offenses							
Rape	2018	4	4	1	0	5	0
	2019	2	2	0	2	4	0
	2020	4	4	1	0	5	0
Fondling	2018	0	1	0	1	2	0
	2019	4	5	0	3	8	0
	2020	1	1	0	1	2	0
Incest	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Statutory Rape	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Robbery	2018	0	0	3	9	12	0
	2019	0	0	0	7	7	0
	2020	0	0	0	5	5	0
Aggravated assault	2018	1	1	1	2	4	0
	2019	1	1	0	8	9	0
	2020	0	0	0	7	7	0
Burglary	2018	3	5	1	0	6	0
	2019	2	7	0	0	7	0
	2020	4	7	0	0	7	0
Motor vehicle theft	2018	0	1	1	9	11	0
	2019	0	1	0	5	6	0
	2020	0	1	0	11	12	0
Arson	2018	1	1	0	0	1	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0

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University City Campus – continued

Crime Classification	Year	On Campus		Non Campus	Public Property	Total	Unfounded
		On Campus Residential	On Campus Total				
Liquor- Law Violations							
Arrest	2018	1	1	0	1	2	0
	2019	1	1	0	0	1	0
	2020	1	1	1	0	2	0
Disciplinary	2018	379	383	0	15	398	0
	2019	480	483	0	8	491	0
	2020	109	110	0	2	112	0
Drug Violations							
Arrest	2018	2	2	0	2	4	0
	2019	2	5	0	4	9	0
	2020	2	2	1	6	9	0
Disciplinary	2018	157	158	0	0	158	0
	2019	188	189	1	5	195	0
	2020	50	51	0	0	51	0
Weapons Possession Violations							
Arrest	2018	0	1	0	1	2	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Disciplinary	2018	3	3	0	0	3	0
	2019	3	3	0	0	3	0
	2020	1	2	0	0	2	0
Violence Against Women Act (VAWA)							
Dating Violence	2018	2	2	0	1	3	0
	2019	3	3	0	0	3	0
	2020	5	5	0	2	7	0
Domestic Violence	2018	0	0	1	0	1	0
	2019	0	0	0	0	0	0
	2020	0	0	2	0	2	0
Stalking	2018	1	1	1	0	2	0
	2019	1	1	0	0	1	0
	2020	0	0	0	1	1	0

Corrections:

For 2019, the following statistics were changed. Internal audit found errors due to data entry error

2019 Aggravated Assault, On- Campus changed from 3 to 1, Non-Campus changed from 1 to 0, Public Property changed from 0 to 8

Hate Crimes:

2020 - one public property simple assault characterized by ethnicity bias.

2019 - one on-campus simple assault characterized by racial bias, one on-campus simple assault characterized by religious bias

2018 -There were no hate crimes reported for this location during 2018.

Notes regarding statistics for Non-Campus Locations

2020

- Drexel University hosted trips in 117 North American cities. There were no international trips in 2020.
- The following jurisdictions responded and provided crime statistics. Boston, MA; DeKalb, IL; Hampton, VA; Pittsburgh, PA. As these crimes were reported to Drexel University in 2021, they will be included in next year's statistics

2019

- Drexel University hosted trips in 180 North American cities and in 30 international locations.
- The following jurisdictions responded and directed us to their website for crime statistics; Sydney, Australia, London, UK, Edingburg, UK. These websites provided aggregate statistics and we were unable to determine if any of the crimes occurred in space utilized by Drexel University.
- The city of Dublin, Ireland responded and advised that they will not release any data.
- Due to the COVID-19 pandemic, mail service was suspended to the following countries and our letters were returned: Ecuador, Guatemala, Malawi, Peru, South Africa, Trinidad & Tobago

2018

- Drexel APS CUWiP Conference New York, NY - 1 Robbery reported by the New York Police Department
- Drexel Annual Medical Education Conference (AMEC), San Diego - City of San Diego replied to our request for statistics referring us to their website. The statistics listed were aggregate stats based on census tract and we were therefore unable to identify incidents that occurred in space utilized by conference attendees.
- Drexel in LA, Los Angeles, CA - The following crimes were reported occurring at the complex utilized by our students and have been included in our statistics - 1 Intimate partner violence, 1 auto theft, 1 burglary, 1 rape
- Drexel University hosted student trips in 22 international locations. The following jurisdictions responded and directed us to their websites for crime statistics; Strojnická, Czech Republic, Edinburgh, Scotland, Munich, Germany, Berlin, Germany, Tokyo, Japan. These websites provided aggregate statistics and we were unable to determine if any of the crimes occurred in space utilized by Drexel University.
- The City of London police directed us to their website and a review determined that no crimes occurred in space utilized by Drexel University.

Center City Campus

Drexel University							
Center City Campus							
Crime Classification	Year	On Campus		Non Campus	Public Property	Total	Unfounded
		On Campus Residential	On Campus Total				
Murder/Non-negligent manslaughter	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Negligent manslaughter	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Sex offenses							
Rape	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Fondling	2018	0	0	0	0	0	0
	2019	0	1	0	0	1	0
	2020	0	0	0	0	0	0
Incest	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Statutory Rape	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Robbery	2018	0	0	0	1	1	0
	2019	0	0	0	0	0	0
	2020	0	0	1	0	1	0
Aggravated assault	2018	0	0	0	2	2	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Burglary	2018	0	0	0	0	0	0
	2019	0	1	0	0	1	0
	2020	0	0	1	0	1	0
Motor vehicle theft	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Arson	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0

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Center City Campus – continued

Crime Classification	Year	On Campus		Non Campus	Public Property	Total	Unfounded
		On Campus Residential	On Campus Total				
Liquor- Law Violations							
Arrest	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Disciplinary	2018	5	5	0	0	5	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Drug Violations							
Arrest	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Disciplinary	2018	1	1	0	0	1	0
	2019	0	0	0	0	0	0
	2020	0	2	0	0	2	0
Weapons Possession Violations							
Arrest	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Disciplinary	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Violence Against Women Act (VAWA)							
Dating Violence	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Domestic Violence	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Stalking	2018	0	0	0	0	0	0
	2019	0	0	0	0	0	0
	2020	0	0	0	0	0	0
Hate Crimes							
There were no hate crimes reported for this location during 2018, 2019, 2020.							

Queen Lane Campus

Drexel University					
Queen Lane Campus					
Crime Classification	Year	On Campus	Public Property	Total	Unfounded
Murder/Non-negligent manslaughter	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Negligent manslaughter	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Sex offenses					
Rape	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Fondling	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Incest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Statutory Rape	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Robbery	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Aggravated assault	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Burglary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Motor vehicle theft	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Arson	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0

Queen Lane Campus – continued

Crime Classification	Year	On Campus	Public Property	Total	Unfounded
Liquor- Law Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Disciplinary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Drug Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Disciplinary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Weapons Possession Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Disciplinary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Violence Against Women Act (VAWA)					
Dating Violence	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Domestic Violence	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Stalking	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Hate Crimes					
There were no hate crimes reported for this location during 2018, 2019, 2020.					
There are no residence halls or non campus buildings at this location.					

LeBow College of Business - Malvern Campus

Drexel University					
LeBow College of Business - Malvern Campus					
Crime Classification	Year	On Campus	Public Property	Total	Unfounded
Murder/Non-negligent manslaughter	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Negligent manslaughter	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Sex offenses					
Rape	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Fondling	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Incest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Statutory Rape	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Robbery	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Aggravated assault	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Burglary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Motor vehicle theft	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Arson	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0

LeBow College of Business - Malvern Campus – continued

Crime Classification	Year	On Campus	Public Property	Total	Unfounded
Liquor- Law Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Disciplinary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Drug Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2018	0	0	0	0
Disciplinary	2019	0	0	0	0
	2020	0	0	0	0
	2019	0	0	0	0
Weapons Possession Violations					
Arrest	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Disciplinary	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Violence Against Women Act (VAWA)					
Dating Violence	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Domestic Violence	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Stalking	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Hate Crimes					
There were no hate crimes reported for this location during 2018, 2019, 2020.					
There are no residence halls or non campus buildings at this location.					

FIRE SAFETY – PROCEDURES, STATISTICS, REPORTS and DOCUMENTATION

Description of each on-campus student housing facility fire safety system and number of fire drills held.

Residence Halls

Location	Address	Fire Alarms Monitored by Public Safety	Bldg. Equipped with Full Sprinkler System	Bldg Has Fire Alarms and Smoke Detectors	Evacuation Plans Posted & Fire Safety Training Conducted	Number of Evacuation Drills Conducted Each Year
UNIVERSITY CITY CAMPUS - On Campus Residence Halls						
BENTLEY HALL	3301 ARCH STREET	YES	YES	YES	YES	4
CANERIS HALL	115 N. 32ND STREET	YES	YES	YES	YES	4
KELLY HALL	203 N. 34TH STREET	YES	YES	YES	YES	4
MILLENNIUM HALL	223 N. 34TH STREET	YES	YES	YES	YES	4
MYERS HALL	3301 RACE STREET	YES	YES	YES	YES	4
NORTH HALL	3200 RACE STREET	YES	YES	YES	YES	4
RACE HALL	3300 RACE STREET	YES	YES	YES	YES	4
TOWERS HALL	101 N. 34TH STREET	YES	YES	YES	YES	4
VAN RENSSELAER	3320 POWELTON AVENUE	YES	YES	YES	YES	4
UNIVERSITY CROSSINGS ^a	3175 JFK BLVD	NO	YES	YES	YES	0
CHESTNUT SQUARE ^a	3200 CHESTNUT STREET	NO	YES	YES	YES	0
THE SUMMIT at UNIVERSITY CITY ^a	3400 CHESTNUT STREET	NO	YES	YES	YES	0
CENTER CITY CAMPUS – On Campus Residence Hall						
STILES ALUMNI HALL	325 N. 15 TH STREET	YES	YES	YES	YES	4

Notes:

- a
 - These locations are managed by American Campus Communities (ACC)
 - Students may choose to live at University-Affiliated housing operated by ACC to fulfill their university housing obligations.
 - Alarms are monitored by a private alarm company.
 - An inquiry was made regarding the number of evacuation drills conducted/scheduled annually at residences owned and operated by American Campus Communities. We were informed that no drills were conducted in 2018, 2019 and 2020, and no information was provided regarding plans for future drills. Residents are provided fire evacuation plans by American Campus Communities at move-in.

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Greek Housing

Location	Address	Fire Alarms Monitored by Public Safety	Bldg. Equipped with Full Sprinkler System	Bldg Has Fire Alarms and Smoke Detectors	Evacuation Plans Posted & Fire Safety Training Conducted	Number of Evacuation Drills Conducted Each Year
Fraternities and Sororities						
SIGMA PHI EPSILON	200 N. 34TH STREET	YES	YES	YES	YES	4
DELTA ZETA	202 N. 34TH STREET	YES	YES	YES	YES	4
ALPHA EPSILON PI	204 N. 34TH STREET	YES	YES	YES	YES	4
ALPHA CHI RHO	206 N. 34TH STREET	YES	YES	YES	YES	4
ALPHA SIGMA ALPHA	208 N. 34TH STREET	YES	YES	YES	YES	4
PI KAPPA ALPHA	210 N. 34TH STREET	YES	YES	YES	YES	4
DELTA PHI EPILSON	212 N. 34TH STREET	YES	YES	YES	YES	4
PHI SIGMA SIGMA	3411A POWELTON AVENUE	YES	YES	YES	YES	4
PHI MU	3411B POWELTON AVENUE	YES	YES	YES	YES	4
LAMBDA CHI ALPHA	3401B POWELTON AVE	YES	YES	YES	YES	12
PI KAPPA PHI	3405 POWELTON AVE	YES	YES	YES	YES	4
THETA CHI	216 N. 34TH STREET	YES	YES	YES	YES	4
ALPHA PI LAMBDA	216 N. 33RD STREET	YES	YES	YES	YES	4

On-campus residential properties consist of twelve (13) residence halls and thirteen (13) Fraternity/Sorority Chapter houses. All on-campus residential properties are equipped with automatic smoke activated fire alarm detection systems and automatic fire suppression systems.

All fire alarm systems in Drexel University managed residence halls and Chapter houses are monitored 24/7 by the Public Safety Communications Center. Alarms at Academic Campus Communities apartments are managed by a private alarm monitoring service.

Fire drills for Drexel University managed residence halls and Chapter houses are conducted each term and fire safety assessments of Fraternity/Sorority houses are performed semiannually.

Policies or rules on portable electrical appliances, smoking and open flames in a student housing facility.

There are various items that are not appropriate for use in student rooms for safety reasons. Possession of one or more of these items can subject the occupant(s) of the room to a fine and possible disciplinary action.

Examples of Non-Permitted Items (This list is not exhaustive):

- Candles
- Coffeemakers
- Extension Cords
- Flammable liquids, gases, or other substances
- Halogen lamps
- High wattage electrical appliances
- Hot plates

- Hoverboards
- Incense and incense holders
- Indoor grills
- Live or cut Christmas trees
- Lofts
- Outside antennas and/or satellite dishes for television/radio reception
- Popcorn poppers
- Portable space heaters; electrical appliances with a heating element
- Sandwich makers
- Toasters
- Toasters ovens
- 2.4 GHz cordless phones

Smoking is not permitted in any University owned/leased facility. Anyone found smoking in violation of University policy will face appropriate corrective action. Students will be charged for any related maintenance or cleaning as the result of smoking in a residential facility. Smoking is prohibited around entrances, exits, and perimeters of all buildings.

Open flames are not permitted. The lighting and burning of candles, incense, or any other item with an open flame is not permitted. Candles are not permitted for decorative purposes.

Procedures for student housing evacuation in the case of a fire.

It is extremely important that all residents be thoroughly informed of proper fire evacuation procedures. Resident Advisors (RAs) review procedures with all residents at the beginning of each term and with each student who moves into the residence hall. As a reminder of their significance, evacuation procedures are reviewed throughout the term:

Building evacuation procedures are posted in every lobby or elevator lobby on each floor of every building.

Campus buildings are to be immediately and totally evacuated whenever the building fire alarm is sounding. Upon discovery of a fire emergency, an individual must accomplish or see to the following actions:

- SOUND AN ALARM! Activating the building fire alarm immediately notifies Drexel Public Safety.
- If conditions allow, shut off all machinery and equipment in your area.
- Leave the building at once.
- Notify Drexel University Public Safety from a safe location:
 - From main campus locations, call 215.895.2222.
 - From off-campus locations, call 911.
- Use campus emergency telephones when possible. Give the dispatcher as much specific information as you can:
 - State that you are reporting a fire.
 - Provide the building name and address, floor and room number, and any other specific information.
- DO NOT hang up until released by the dispatcher.

Policies regarding fire safety education and training programs provided to the students and employees.

Fire safety education and training programs is offered by members of the Office of Fire and Emergency Services who are experienced in fire safety outreach. This includes fire extinguisher training, evacuation procedures, emergency preparedness, policies, and non-permitted items. It is offered in-person and virtually to students and employees involved in student housing and areas related to student housing.

Emergency procedures are unique for each building and they are tailored as such. In the event of a fire, students and employees are instructed to: notify occupants and help those needing assistance in the immediate area, confine the fire by closing doors as exiting, activate the nearest fire alarm pull station, evacuate the building at the nearest exit, call Drexel's emergency number, and do not re-enter until authorized to do so by emergency personnel.

Information provided for the fire safety programs is also available online at any time at: drexel.edu/publicsafety/fire-emergency/overview/.

Procedures that students and employees should follow in the case of a fire.

When a fire alarm sounds, every person is required to evacuate the building immediately:

- DO NOT use elevators for evacuation.
- Evacuation is required every time the fire alarm sounds, regardless of the cause.
- Students should turn on lights, close room doors, and use the nearest marked stairway not blocked by smoke or fire.
- Leave the building quickly and quietly and proceed in an orderly manner to the designated assembly area.
- When an evacuation is required, a staff member residing on the floor will meet with the residents at a pre-designated location outside of the building and account for all residents as best as possible.
- The staff member is to report the status of their floor as soon as possible to the person in charge (i.e., Residence Director, Fire Official, or University Official).
- Any student who remains in the building after a fire alarm sounds, for any reason, is subject to disciplinary action.
- The building is not to be reentered by any student until an "All Clear" is announced by a University official.

Titles of each person or organization to which students and employees should report that a fire occurred.

To report that a fire occurred:

David Hollinger, Director, Fire and Emergency Services, or Madonna Calderoni, Assistant Director, Fire and Life Safety.

Plans for future improvements in fire safety, if determined necessary by the institution.

Replace fire extinguisher simulator in two years to train staff and student groups. Use alternate and modern methods for fire safety messages to reach students. The University continues to assess and upgrade fire safety equipment as an ongoing process to ensure that all equipment meets national fire safety standards. Future improvements will be made as needed as part of the ongoing assessment process.

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Residential Fire Statistics

2020							
Name of Facility		Total Fires in	Fire	Cause of	Number of Injuries	Number of	Value of Property Damage
		Each Building	Number	Fire	Requiring	Deaths	
					Medical Facility	Related	
						to a Fire	
University City Campus - On Campus Residence Halls							
BENTLEY HALL	3301 ARCH STREET	0	N/A	N/A	N/A	N/A	N/A
CANERIS HALL	115 N. 32ND STREET	0	N/A	N/A	N/A	N/A	N/A
KELLY HALL	203 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
MILLENNIUM HALL	223 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
MYERS HALL	3301 RACE STREET	1	1	HEATING	0	0	\$1,057.00
NORTH HALL	3200 RACE STREET	0	N/A	N/A	N/A	N/A	N/A
RACE HALL	3300 RACE STREET	1	1	UNDETERMINED	0	0	\$0.00
TOWERS HALL	101 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
VAN RENSSELAER	3320 POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
CHESTNUT SQUARE	3200 CHESTNUT STREET	0	N/A	N/A	N/A	N/A	N/A
THE SUMMIT at UNIVERSITY CITY	3400 LANCASTER AVENUE	1	1	ELECTRICAL	0	0	\$50.00
UNIVERSITY CROSSINGS	3175 JFK BLVD	1	1	MECHANICAL	0	0	\$450.00
Fraternities and Sororities							
SIGMA PHI EPSILON	200 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA ZETA	202 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA EPSILON PI	204 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA CHI RHO	206 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA SIGMA ALPHA	208 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
PI KAPPA ALPHA	210 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA PHI EPSILON	212 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
PHI SIGMA SIGMA	3411A POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
PHI MU	3411B POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
LAMBDA CHI ALPHA	3401B POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
PI KAPPA PHI	3405 POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
THETA CHI	216 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA PI LAMBDA	216 N. 33RD STREET	0	N/A	N/A	N/A	N/A	N/A
Total		4			0	0	\$1,557.00
Center City Campus – On Campus Residence Hall							
Stiles Alumni Hall	325 N. 15 TH STREET	0	N/A	N/A	N/A	N/A	N/A
Total		0			0	0	\$0.00

2021 Annual Report of Campus Security and Fire Safety Policies and Procedures

Residential Fire Statistics – continued

2019							
Name of Facility		Total Fires in	Fire	Cause of	Number of Injuries	Number of	Value of Property Damage
		Each Building	Number	Fire	Requiring	Deaths	
					Medical Facility	Related to a Fire	
University City Campus - On Campus Residence Halls							
BENTLEY HALL	3301 ARCH STREET	0	N/A	N/A	N/A	N/A	N/A
CANERIS HALL	115 N. 32ND STREET	1	1	MECHANICAL	0	0	\$1,565.00
KELLY HALL	203 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
MILLENNIUM HALL	223 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
MYERS HALL	3301 RACE STREET	0	N/A	N/A	N/A	4	N/A
NORTH HALL	3200 RACE STREET	0	N/A	N/A	N/A	N/A	N/A
RACE HALL	3300 RACE STREET	1	1	COOKING	0	0	\$0.00
TOWERS HALL	101 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
VAN RENSSELAER	3320 POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
CHESTNUT SQUARE	3200 CHESTNUT STREET	0	N/A	N/A	N/A	N/A	N/A
THE SUMMIT at UNIVERSITY CITY	3400 LANCASTER AVENUE	0	N/A	N/A	N/A	N/A	N/A
UNIVERSITY CROSSINGS	3175 JFK BLVD	0	N/A	N/A	N/A	N/A	N/A
Fraternities and Sororities							
SIGMA PHI EPSILON	200 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA ZETA	202 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA EPSILON PI	204 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA CHI RHO	206 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA SIGMA ALPHA	208 N. 34TH STREET	1	1	COOKING	0	0	\$0.00
PI KAPPA ALPHA	210 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA PHI EPSILON	212 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
PHI SIGMA SIGMA	3411A POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
PHI MU	3411B POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
LAMBDA CHI ALPHA	3401B POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
PI KAPPA PHI	3405 POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
THETA CHI	216 N. 34TH STREET	1	1	UNDETERMINED	0	0	\$30.00
ALPHA PI LAMBDA	216 N. 33RD STREET	0	N/A	N/A	N/A	N/A	N/A
TAU KAPPA EPSILON*	3421 POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
Total		4			0	0	\$1,595.00
Center City Campus – On Campus Residence Hall							
Stiles Alumni Hall	325 N. 15 TH STREET	0	N/A	N/A	N/A	N/A	N/A
Total		0			0	0	\$0.00
TAU KAPPA EPSILON was suspended during the 2017 calendar year and is currently not being used for housing.							

2021 Annual Report of Campus Security and Fire Safety Policies and Procedures

Residential Fire Statistics – continued

2018							
Name of Facility		Total Fires in	Fire	Cause of	Number of Injuries	Number of	Value of Property Damage
		Each Building	Number	Fire	Requiring	Deaths	
					Medical Facility	Related	
						to a Fire	
University City Campus - On Campus Residence Halls							
CANERIS HALL	115 N. 32ND STREET	3	1	OTHER	0	0	\$0.00
			2	OTHER	0	0	\$0.00
			3	UNDETERMINED	0	0	\$0.00
KELLY HALL	203 N. 34TH STREET	1	1	INTENTIONAL	0	0	\$0.00
MILLENNIUM HALL	223 N. 34TH STREET	1	1	ELECTRICAL	0	0	\$0.00
MYERS HALL	3301 RACE STREET	0	N/A	N/A	N/A	4	N/A
NORTH HALL	3200 RACE STREET	0	N/A	N/A	N/A	N/A	N/A
RACE HALL	3300 RACE STREET	0	N/A	N/A	N/A	N/A	N/A
TOWERS HALL	101 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
VAN RENSSELAER	3320 POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
CHESTNUT SQUARE	3200 CHESTNUT STREET	0	N/A	N/A	N/A	N/A	N/A
THE SUMMIT at UNIVERSITY CITY	3400 LANCASTER AVENUE	1	1	ELECTRICAL	0	0	\$18,700.00
UNIVERSITY CROSSINGS	3175 JFK BLVD	0	N/A	N/A	N/A	N/A	N/A
Fraternities and Sororities							
SIGMA PHI EPSILON	200 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA ZETA	202 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA EPSILON PI	204 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA CHI RHO	206 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA SIGMA ALPHA	208 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
PI KAPPA ALPHA	210 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
DELTA PHI EPSILON	212 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
PHI SIGMA SIGMA	3411A POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
PHI MU	3411B POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
LAMBDA CHI ALPHA	3401B POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
PI KAPPA PHI	3405 POWELTON AVE	0	N/A	N/A	N/A	N/A	N/A
THETA CHI	216 N. 34TH STREET	0	N/A	N/A	N/A	N/A	N/A
ALPHA PI LAMBDA	216 N. 33RD STREET	0	N/A	N/A	N/A	N/A	N/A
TAU KAPPA EPSILON*	3421 POWELTON AVENUE	0	N/A	N/A	N/A	N/A	N/A
Total		6			0	0	\$18,700.00
Center City Campus – On Campus Residence Hall							
Stiles Alumni Hall	325 N. 15 TH STREET	0	N/A	N/A	N/A	N/A	N/A
Total		0			0	0	\$0.00
TAU KAPPA EPSILON was suspended during the 2017 calendar year and is currently not being used for housing.							