

American National University Lexington Campus

2019 Annual Security Report

Ensuring the safety and security of the campus community is a critical priority for American National University (the "University"). In recognition of this fact, and in keeping with applicable federal requirements, the University, located at 2376 Sir Barton Way, Lexington, KY 40509, publishes each year this Annual Security Report (the "Report").

This Report discloses information concerning the University's safety and security policies and procedures, as well as statistics regarding certain types of crimes reported to the University and local law enforcement during the prior year. It is the University's intention that this Report will inform the campus community of the University's safety and security policies, provide the community with key information regarding the security of the University and surrounding areas, and ultimately, create a safer more secure campus environment.

This Report is made available to the public on the University's website. Notice of the Report's availability is distributed to all prospective students and employees prior to enrollment or employment, as applicable. Notice of the Report's availability also is distributed annually to all current students and employees.

The Clery Act

The *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* (the "Clery Act") is the landmark federal law, originally known as the Campus Security Act that requires postsecondary institutions across the United States to disclose each year information regarding campus safety and security policies, crime, and related topics. The law is tied to an institution's participation in the federal student financial aid programs, and applies to most institutions of higher education (public and private). The Clery Act is enforced by the Clery Act Compliance Division of the United States Department of Education. The law has been amended on several occasions over the years. Most recently, the Violence Against Women Reauthorization Act of 2013 amended the Clery Act to require institutions, among other things, to gather and report statistics for incidents of domestic violence, dating violence, and stalking. In addition, the 2013 amendments direct institutions to develop and distribute policies, procedures, and programs pertaining to these incidents. New regulations issued by the Department of Education and related to the Clery Act became effective on July 1, 2015. The Clery Act is located in the United States Code at 20 U.S.C. § 1092(f), and the related regulations are located at 34 C.F.R. § 668.46.

I. POLICIES AND INFORMATION RELATING GENERALLY TO CAMPUS SAFETY AND SECURITY

Security of and Access to Campus Facilities

The University is located on Sir Barton Way in the Hamburg area and is easily accessible from I-64, I-75 and US 60. This 30,000-square-foot campus houses 15 classrooms, five computer labs, a medical assisting lab, an operating room where students perform simulations of medical procedures and an information technology lab. It is serviced by the public transportation system. The University does not operate, sponsor, or otherwise recognize any on-campus or off-campus student housing or student organizations, including fraternities or sororities.

Certain areas of the campus are "electronically patrolled," or monitored by use of Internet protocol (IP) cameras. In addition, the University is monitored remotely by a professional security agency. Typically, all doors to the building remain locked from 10:00 p.m. until 7:00 a.m. and only designated personnel have access to the building during those times. All visitors should enter through the main entrance and sign a Visitor's Log. Enrolled students are required to enter and exit campus facilities through designated doors. Neither visitors nor guests are allowed to access or visit any area of the campus without the permission of an authorized school official.

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Campus Security Authorities

Though the University does not maintain a campus police or security department, select staff members at each campus are designated to serve as Campus Security Authorities (“CSAs”). These individuals are not police officers or security professionals. Campus Security Authorities do not possess the power to arrest. They do not attempt to apprehend perpetrators or to determine whether a crime took place. These tasks are the responsibility of law enforcement.

Campus Security Authorities are individuals who have significant responsibility for student and campus activities, who monitor the security of institutional facilities and equipment, and who are designated by the University to receive reports of criminal offenses from students, employees, and members of the campus community. The University’s Campus Security Authorities have the authority to ask persons for identification and to determine whether individuals have legitimate business at the University. Campus Security Authorities also may direct individual to leave University premises. The University’s Campus Security Authorities include the following senior staff members:

CSA Name	Title	Telephone Number
Cliff Messina	Campus Director	859-253-0621
Lesa Moore	Site Administrator	859-253-0621

Relationship with Local Law Enforcement

Criminal incidents are referred to the local police who have jurisdiction over the campus. The University does not have any agreements with local law enforcement for the investigation of alleged criminal offenses. However, the Campus Security Authorities at the University maintain a highly professional working relationship with local law enforcement.

Reporting Crimes and Emergencies Occurring on Campus

Members of the University’s community, including students, faculty, staff, and visitors, are strongly encouraged to accurately and promptly report any crime, emergency, or other public safety concern to the University’s Campus Security Authorities and to local law enforcement, including when the victim of a crime may be unable to make such a report. In addition, any such crimes or concerns may be reported to the University’s senior staff. Prompt reporting will ensure that timely measures can be taken, to include assisting any victim, preserving evidence, issuing emergency and warning notifications, and calculating accurate, annual crime statistics.

Reports may be made to the University’s CSAs in person or via telephone using the numbers set out above. Emergencies may be reported to local law enforcement in person or via telephone at 911. Non-emergencies may be reported to local law enforcement in person or via telephone at 859-258-3650.

Individuals should report any alleged instances of unlawful discrimination, harassment, retaliation, sexual assault, domestic violence, dating violence, stalking, or suspected physical or sexual abuse of children in accordance with the instructions detailed in the sections below.

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Confidential and Anonymous Reporting of Crime

The University recognizes that under certain circumstances victims of, or witnesses to, a crime may wish to make an anonymous report of the crime. There are two avenues for anonymous reporting.

First, victims or witnesses may report information to the Campus Director and request that their identity remain confidential. In this type of reporting the Campus Director may identify the reporting party only to University officials with a need to know, and who are also bound by the promise of confidentiality to the reporting party. It is important to know that since the identity of the reporting party is in fact known, and since no legal protection exists to shield the University or those of its employees who know the reporting party's identity from being compelled to disclose that information by court order, the identity of the victim or witness may be disclosed if such disclosure is ordered by a court of competent jurisdiction. Further, in any situation where the University concludes that disclosure of the reporting party's identity is necessary to prevent imminent harm to that party or any other individual, the University may make such disclosure.

Second, the University has created an anonymous reporting form located on the Internet at the following address:

<http://www.an.edu/documents-library/about/consumer-disclosure/crime-tip/>

An individual who wishes to make an anonymous report of a crime may do so using the noted form. For this type of reporting the identity of the disclosing party is not requested or captured by the form.

University Response to Reports of Criminal Actions or Other Emergencies

The University's Campus Security Authorities will respond promptly to reports of any crime involving persons or property. The first priority subsequent to receiving any such report will be to ensure the safety of the victim and of the campus community. This may involve initiation of the emergency notification or timely warning protocols discussed below. In addition, the University will adhere to the policies and processes discussed below for assisting victims who report crimes involving sexual violence.

Once the safety of the victim and campus community are secured, the Campus Security Authorities will investigate the alleged criminal activity. If the investigation concludes that a violation of the state criminal code likely occurred, the matter will be referred to local law enforcement.

The University's Campus Security Authorities will enter any crime, emergency or other public safety concern brought to their attention into the University's online incident report system, taking care to indicate whether the reported incident was an alleged crime. In addition, all criminal offenses reported to any Campus Security Authority are reported to the national Incident-Based Reporting System, in accordance with federal mandates.

Programs and Information to Promote Safety and Security Awareness

An informed campus community can significantly reduce the occurrence of crime on campus. For this reason, information regarding campus security procedures and crime prevention is provided and discussed during new employee and new student orientation, respectively, and made available online throughout the academic year (educational programming specific to the prevention of substance abuse and sexual violence is discussed elsewhere in this Report).

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With the help of local law enforcement, the University also provides periodic campus security and crime prevention educational programming throughout the year. Such programs are offered with the goal of helping members of the University community to understand and make responsible decisions concerning their safety and well-being. Among the principles emphasized during such training are the precepts set out below relating to security awareness.

Security Awareness

The University strives to provide its students and employees a secure and safe environment in which to teach and learn, including through compliance with applicable federal, state, and local building codes and board of health and fire marshal regulations. This having been said, the University recognizes, and encourages others to be aware, that no environment is entirely free of risk. Each person must assume responsibility for his or her own safety both on-campus and off. With this in mind, the University encourages all students, faculty, staff, and visitors to take an active role in their own safety and security while on campus by adhering to the following guidelines:

- Walk in well-lighted and well-traveled areas after dark. Walk with a friend.
- Immediately report all suspicious persons, vehicles, or activities to a CSA.
- Immediately report all crimes, security problems, or hazardous conditions to a CSA.
- Remain subscribed to *E2Campus*, which is the American National University campus alert system. Students are enrolled automatically.
- Take advantage of informational programs sponsored on campus.
- Never study alone in an isolated area of a campus building.
- Lock your car and secure valuables when using campus parking facilities.
- Use bicycle racks located on campus, and lock your bicycle.
- Become familiar with the University's *Emergency Response Plan*, which is available on the University's website.
- Become familiar with emergency exits and the locations of fire alarm pull stations and extinguishers in your building.
- Lock offices when you are not present.

Daily Crime Log

Pursuant to the Clery Act, institutions that maintain a campus police or security department are required to maintain a daily crime log. The log records criminal incidents and alleged criminal incidents that are reported to such personnel. Because the University does not maintain a campus police or security department, it does not maintain a daily crime log.

II. POLICIES AND INFORMATION RELATING TO SUBSTANCE ABUSE

The University is committed to protecting the safety, health, and well-being of its students, employees, and all people who come into contact with the University community. The abuse of alcoholic beverages, drugs, intoxicants, or other controlled substances ("substance abuse") poses a direct and significant threat to this goal.

Substance abuse can, among other things, impair thinking, reading, comprehension and verbal skills, produce mood swings, panic, and violent and bizarre behavior, and result in loss of physical control or death.

In an effort to create and maintain a campus environment free from such substance abuse, the University established its substance abuse prevention program. The program is consistent with the applicable sections of

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Federal Regulations 34 CFR Part 84 (Drug-Free Workplace) and Part 86 (Drug and Alcohol Abuse Prevention), and is set forth for students and employees alike. It consists of two primary parts. First, the University developed its *Substance Abuse Prevention Program* disclosure (the "Substance Abuse Disclosure"), which includes detailed information on a wide range of topics relating to substance abuse, including standards of conduct, institutional and legal sanctions, health risks, prevention, and treatment options. Second, the University put into place a set of policies designed to ensure that the Substance Abuse Disclosure is widely distributed and discussed, and that the effectiveness of the disclosure and distribution protocols is subject to periodic evaluation.

Students and employees can obtain a copy of the University's complete Substance Abuse Disclosure (in electronic or hard copy format) by requesting a copy from the Campus Director. Following, for your convenience, we've excerpted from the Substance Abuse Disclosure the University's *Substance Abuse Standards of Conduct*.

Substance Abuse Standards of Conduct

The University is dedicated to ensuring a learning and working environment free from substance abuse. Accordingly, and as a matter of policy, the University strictly prohibits students and employees from engaging in the following conduct.

- The unlawful use, possession, sale, conveyance, distribution, dispensing, purchase, storage, or manufacture of alcoholic beverages, drugs, intoxicants, or other controlled substances in any amount or in any manner:
 - on University premises (including in automobiles or any other vehicle parked on University property),
 - as part of any University activity, or during work hours (including meal periods and breaks); or
 - off University premises, if doing so impairs their ability to perform their University-related duties in any way, presents a danger to the well-being and welfare of other students or employees, or compromises the reputation of the University.
- Reporting to the University (for any purpose) under the influence of alcoholic beverages, drugs, intoxicants, or other controlled substances.

Notwithstanding the Standards of Conduct detailed above, students and employees under the influence of over-the-counter or legally prescribed medication may continue to attend class or come to work, as long as they do not pose a threat to their own safety or the safety of others, or their performance is not adversely affected. Whether and to what extent performance is adversely affected will be determined by the University, in its sole discretion.

A student or employee with a medical condition that requires accommodation, including accommodation due to the effects of prescription medication, should request accommodation pursuant to the University's ADA Accommodation Policy. A student or employee under the influence of prescription medication may be required to take a leave of absence or comply with appropriate action as determined by the University.

University-Sponsored Special Events

Possession and consumption of alcoholic beverages while on University premises may be authorized by the University for certain employee or student events. It is the policy of the University that employees and students participating in such events and consuming alcoholic beverages will be expected to do so in accordance with all applicable federal, state, and local laws, including laws relating to underage drinking. Further, employees and students are expected to demonstrate consideration for their safety and well-being, as well as for the safety and well-being of others, at all times before, during, and after such events.

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III. POLICIES AND INFORMATION RELATING TO UNLAWFUL DISCRIMINATION, HARASSMENT, AND RETALIATION

The University is committed to providing an environment for students and employees that is pleasant and free of unlawful discrimination, harassment, and retaliation. Accordingly, unlawful discrimination, harassment, and retaliation by students, employees, co-workers, supervisors, managers, executives, directors, or any other member of the University community is strictly prohibited.

University employees have a duty and obligation to immediately report alleged instances of unlawful discrimination, harassment, or retaliation to the Campus Director. This responsibility is discussed in more detail in the *Staff/Faculty Handbook*. Any student who feels that he or she has been subject to unlawful discrimination, harassment, or retaliation also should immediately inform the Campus Director. In the event the employee or student feels the Campus Director is responsible for, or complicit in, the alleged misconduct, the individual may contact Mr. David Yeaman, Executive Director of Compliance and Accreditation, Campus Support Operations at 540-444-5211.

Upon receipt of a report of alleged unlawful discrimination, harassment, or retaliation, the University will investigate without delay. At times, it also may be necessary to undertake intermediate measures before completing an investigation to ensure that further unlawful conduct does not occur. The University's investigation will be conducted in an objective and impartial manner, and carried out in such a way as to maintain confidentiality to the greatest extent possible. All pertinent facts will be carefully reviewed and the accused will be given a full opportunity to explain his or her conduct before any decision is reached. When the investigation is complete, the University will inform the person filing the complaint and the person alleged to have engaged in the unlawful conduct of the results of the investigation.

If it is determined that inappropriate conduct has been committed by one of the University's employees, the University will take appropriate disciplinary action, consistent with the *Staff/Faculty Handbook*. Such action may range from counseling to immediate termination of employment. In the event the behavior in question does not lead to immediate termination of employment, but instead leads to some form of written warning, the disciplined employee will have an opportunity to defend his or her actions and rebut related allegations at the time the disciplinary action is issued.

If it is determined that inappropriate conduct has been committed by one of the University's students, the University will take appropriate disciplinary action, consistent with the student disciplinary processes described in the *Catalog*. Such action may range from suspension to termination. A student who has been suspended or terminated as a result of a disciplinary decision at the campus-level may appeal the determination pursuant to the appeal process set forth in the *Catalog*.

Programs and Information to Prevent Unlawful Discrimination, Harassment, and Retaliation

On an annual basis, the University's Human Resources Department conducts mandatory on-campus training and web-based training for all employees relating to the prevention of unlawful harassment, discrimination, and retaliation. Such training also is conducted with all new employees as part of the new hire orientation process.

The University conducts training relating to unlawful harassment, discrimination, and retaliation for incoming students during orientation, and at least annually for all students. This training includes the electronic distribution of the University's current *Catalog* (which contains policies and information on the prohibition of unlawful harassment), as well as literature promoting prevention.

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Additional information concerning the University's policies and procedures relating to the reporting, prevention, and management of unlawful harassment, discrimination, and retaliation are located in the *Catalog* and the *Staff/Faculty Handbook*.

IV. POLICIES AND INFORMATION RELATING TO SEXUAL VIOLENCE

The University strictly prohibits sexual assault, domestic violence, dating violence, or stalking (collectively, "sexual violence") by employees and students, and will not tolerate any such conduct in any form. These offenses have the following meanings for purposes of the policies and procedures set out in this Report:

- *Sexual Assault* is defined as an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Program.
- *Domestic Violence* is defined as felony or misdemeanor crimes 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 receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- *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 a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- *Stalking* is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or to suffer substantial emotional distress.

In addition, for purposes of this Report, the term *Consent* means expressed or implied assent. However, assent does *not* constitute consent if (1) it is given by a person who lacks the mental capacity to authorize the conduct and such mental incapacity is manifest or known to the actor, (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, or (3) it is induced by force, duress or deception.

Reporting Incidents of Sexual Violence

If any individual (student or employee) is a victim of sexual violence, his or her first priority should be to locate a place of safety. He or she next should obtain any necessary medical treatment.

Victims are not required to report incidents of sexual violence. However, the University **strongly** advocates that subsequent to securing safety and medical care, any victim of sexual violence report the incident immediately to the University's Campus Security Authorities and to local law enforcement. Time is a critical factor for evidence collection and preservation. Preserving evidence is very important, as it may be necessary to the proof of sexual assault, domestic violence, dating violence, or stalking, or in obtaining a protection order.

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Reports may be made to the University's Campus Security Authorities in person or via telephone using the numbers set out above. Emergencies may be reported to local law enforcement in person or via telephone at 911. Non-emergencies may be reported to local law enforcement in person or via telephone at 859-258-3650. If any individual requires assistance notifying local law enforcement, the University's Campus Security Authorities can and will assist.

University employees who learn of an incident of sexual violence have a duty and an obligation to report any such incident to the University's Campus Director. This responsibility is consistent with the employee responsibilities set forth in the *Staff/Faculty Handbook*.

Individual who wish to make an anonymous report of an incident of sexual violence may do so using the procedures outlined for anonymous reporting of crimes.

<http://www.an.edu/documents-library/about/consumer-disclosure/crime-tip/>

An individual who wishes to make an anonymous report of a crime may do so using the noted form. For this type of reporting the identity of the disclosing party is not requested or captured by the form.

Rights, Services, and Accommodations for Victims in Matters Involving Allegations of Sexual Violence

Any student or employee who reports to the University that he or she has been a victim of sexual violence, whether the offense occurred on or off campus, shall be provided with a written explanation of his or her rights and options, services and accommodations available to victims, and an explanation of the procedures for institutional disciplinary action in cases of alleged sexual violence. Information regarding the victim's rights and options, services, and accommodations, shall include:

- His or her options to (1) notify proper law enforcement authorities, including on-campus and local police; (2) be assisted by campus authorities in notifying law enforcement authorities if he or she so chooses; and (3) decline to notify such authorities.
- His or her rights and options for (and available assistance in) changing academic, living, transportation, and working situations if so requested and reasonably available, regardless of whether he or she chooses to report the crime to the authorities.
- His or her options for existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services, both within the University and in the campus community.

The University also will provide the victim with information concerning the range of available protective measures. Such protective measures may include escorts, special parking arrangements, providing a temporary cellphone, changing classroom location, work location or supervisors, or allowing a student to complete assignments from home.

Finally, where applicable, the University will inform the victim of his or her rights, and the University's responsibilities, regarding orders of protection, no contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court. The University complies with applicable state law in recognizing orders

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of protection, and encourages any person who obtains an order from any U.S. state to provide a copy to the University's Campus Security Authorities. Individuals may then meet with the University to develop a safety action plan, which is a plan for the University and the victim to reduce risk of harm while the individual is on campus or coming and going from campus.

Investigations and Disciplinary Proceedings Involving Allegations of Sexual Violence

Any reported incident of sexual violence will be subject to a prompt, fair, and impartial process from the initial investigation to the final result. This process will be conducted by the University's Campus Director and Senior Executive Vice President of Operations. Such individuals receive annual training on the issues related to sexual violence and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. Though no specific timelines are prescribed for the completion of the investigation and hearing, the University anticipates completing these processes as quickly as possible, understanding that the quality and integrity of the processes cannot be compromised.

The investigation will include a period of fact gathering, a hearing, and a written determination. During the fact gathering period, the University may conduct interviews and request documentation or other information from the accuser and the accused. Once the University has completed its fact gathering, it will schedule a hearing.

In connection with the proceedings, both the accuser and the accused will be provided with the definitions of sexual assault, domestic violence, dating violence, stalking, and consent in the applicable jurisdiction and as appropriate to the matter at hand.

The University will provide the accuser and the accused with the same opportunities to have others present, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. Consistent with federal law, the University will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or proceeding; however, the University has established the following restrictions regarding the extent to which the advisor may participate in the proceedings, which apply equally to both parties:

- Advisors may offer counsel and support to the party they represent, but they may not directly address the University's representatives, or any other party to the proceeding.
- Under no circumstances may they question, examine, or cross-examine any party to the proceeding.

A preponderance of the evidence standard will be utilized in the determination as to whether an incident of sexual violence has occurred. Both the accuser and the accused will be informed simultaneously in writing of the following:

- The outcome of any institutional disciplinary proceeding that arises from an allegation of sexual violence.
- The institution's procedures for the accused and the victim to appeal the results of the institutional disciplinary proceeding.
- Any change to the results that occurs prior to the time that such results become final.
- When such results become final.

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Sanctions or protective measures that the University may impose following a final determination of an institutional disciplinary procedure regarding sexual violence may include, without limitation, suspension or expulsion from the University or termination of employment.

Confidentiality in Matters Involving Allegations of Sexual Violence

Throughout the investigative and disciplinary processes, the University will protect the accuser's identity by limiting the persons with knowledge of the matter to those directly involved in the proceedings, and by ensuring that all documentation relating to the proceedings is maintained by the University's Campus Director, apart from the standard student/employee filing systems. In this manner, the University will ensure that publically available record keeping may be accomplished without inclusion of identifying information about the accuser (to the extent permissible by law).

In addition, the University may change an accuser's academic situation in connection with any such investigation or proceeding, if the change is requested by the accuser and is reasonably available. The University will maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the University to provide the accommodations or protective measures.

Programs and Information to Prevent Sexual Assault, Domestic Violence, Dating Violence, or Stalking

American National University provides educational programming to students and staff regarding the awareness of and prevention of sexual violence. Primary prevention and awareness programs concerning sexual violence are conducted for all incoming students and new employees during their respective orientation processes, and ongoing prevention and awareness programs concerning sexual violence are conducted at least annually for all current students and employees. These training programs include a review of the policies set out in this Report and, as appropriate, a review of the University's *Staff/Faculty Handbook* or the *Catalog*.

In addition, as required under federal law, these programs specifically emphasize:

- That the University prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as those terms are defined in the Clery regulations (and set out in this Report).
- The definitions of sexual assault, domestic violence, dating violence, stalking, and consent (in reference to sexual activity) in the applicable jurisdiction.
- The information detailed in this Report regarding the (1) the rights, services, and processes available to the parties involved in a matter involving allegations of sexual violence; and (2) disciplinary proceedings involving allegations of sexual violence.
- Safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or to intervene when there is a risk that another individual will experience domestic violence, dating violence, sexual assault, or stalking.
- Information on risk reduction to recognize warning signs of abusive behavior and to avoid potential attacks.
- Information regarding existing counseling, health, mental health, victim advocacy, legal assistance, and other services available in the community.

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Information Regarding Registered Sex Offenders

In Kentucky, convicted sex offenders must register with the Kentucky State Police. The Kentucky State Police is now providing sex/criminal offender registration information to the public through this website. The intent of this site is public safety and awareness. <http://kspsor.state.ky.us/>

Members of the campus community also may elect to visit the Federal Bureau of Investigation's *National Sex Offender Public Website*, which provides law enforcement information provided by each state concerning registered sex offenders: <https://www.fbi.gov/scams-and-safety/sex-offender-registry>

Reporting Suspected Physical or Sexual Abuse of Children

Any employee or student of the University who receives information related to suspected physical or sexual abuse of children *or* who reasonably suspects the physical or sexual abuse of a child should immediately report such information to his or her Campus Director. If there is reason to believe that immediate protection for the child is advisable, the individual also should report the suspected abuse to the appropriate law enforcement agency.

V. TIMELY WARNING OF CERTAIN CRIMES

Should crimes or incidents occur, either on or off-campus, which, in the judgment of the University's Campus Director, do not pose an immediate threat but constitute an ongoing or continuing threat, a campus-wide "timely warning" will be issued to the campus community in a manner that will aid in the prevention of similar occurrences. This timely warning will be issued through the University e-mail system to students, faculty, and staff. Related information also will be posted in classrooms, in the learning resource center, on student bulletin boards, and in common areas, as appropriate. This timely warning will withhold the names and other identifying information of victims to ensure confidentiality.

VI. EMERGENCY MANAGEMENT

The purpose of the University's emergency response and evacuation procedures is to establish policies, protocols, and an organizational structure ready to effectively respond to and manage on-campus emergency events. Accordingly, we outline below the administrative steps for response to, stabilization of, and recovery from an emergency incident, the specific procedures that the University will use to communicate with faculty, staff, students and the general public during an emergency, and the responsibilities of the campus staff tasked with executing emergency protocols.

General Emergency Evacuation and Notification Procedures

To facilitate its emergency response capabilities, the University utilizes *E2Campus*, a multi-modal emergency notifications system that sends notifications via text message to cellular phones and other electronic devices and mediums. Students are enrolled in *E2Campus* at the time of enrollment, and faculty and staff are enrolled at the time of hire.

Should an event occur, either on or off-campus, which, in the judgment of the Campus Director, constitutes a significant emergency or dangerous situation involving an immediate threat to the health or safety of the campus community, a campus-wide notification will be issued by activating *E2Campus*. As described in more detail below, the University will, without delay, and taking into account the safety of the community, determine the

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content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the Campus Director, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. If the Campus Director is unable to initiate the emergency notification, it will be carried out by one of the other Campus Security Authorities named above.

As noted above, *E2Campus* is only for use upon the confirmation of an emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring at the campus.

“Immediate” threat as used here encompasses an imminent or impending threat. “Confirmation” means that a Campus Security Authority has verified that a legitimate emergency or dangerous situation exists. Some examples of significant emergencies or dangerous situations are:

- Extreme weather (*e.g.*, tornado, flood)
- Earthquake
- Terrorist incident
- Armed person
- Bomb Threat
- Explosion

Examples of situations that would **not** necessitate an emergency response or alert include:

- Power outage
- Snow closure
- String of larcenies
- Minor altercation

As time permits, the Campus Director will determine whether, in his or her judgment, the information suggesting that an emergency has occurred is credible through consultation with other Campus Security Authorities and personal investigation of the reported emergency event. As noted above, the Campus Director also will consider whether issuing a notification or making an announcement would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Given the size and nature of the campus, any emergency notification will be distributed to all members of the campus community (*i.e.*, the Campus Director will not limit the notification to select segments of the campus population).

In the event of an emergency, the Campus Director will craft a brief notification containing pertinent information about the nature of the emergency (*e.g.*, approaching tornado, gas leak) and include direction regarding the appropriate response (*e.g.*, take cover, evacuate). In addition to activating *E2Campus*, the Campus Director may, if warranted, make an emergency announcement over the University intercom system, provided the facility is equipped with such a system. The Campus Director will determine the content of any such announcement, and once again, will modify the announcement, as needed, to ensure that it does not compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

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Evacuation Procedures

Should an emergency notification be made directing a general evacuation, all persons on campus should exit the building immediately by way of the nearest stairwell, marked with a lighted red exit sign, and follow the signs, exiting to the outside and quickly proceeding to the parking lot in front of the building. If the nearest stairwell is blocked, individuals should use another stairwell. Posted evacuation routes for each office or classroom space are located throughout the building, typically near the door. Persons should *not* use any elevator while evacuating. It is the responsibility of all able staff to assist any persons with disabilities in descending the stairwell quickly and safely.

Individuals who exit the building first must position themselves far enough away from the street to enable everyone to stand clear of emergency vehicles. The street must be kept clear at all times, so as not to hamper the movement of emergency vehicles into the area.

Once outside the building, the Campus Security Authorities will confirm that appropriate emergency personnel have been contacted, congregate all employees in the parking lot in front of the building, confirm that all employees and visitors are out of the building, and meet with emergency personnel at the front entrance to provide additional information. Staff members trained in CPR and rescue breathing should survey the individuals outside to determine if anyone is in need of first aid and provide such aid as required. Individuals should not re-enter the campus building for any reason until it is declared safe by the appropriate emergency personnel and the Campus Director has agreed to permit persons to re-enter.

Post-Emergency Measures

As soon as practicable following the occurrence of an emergency, the Campus Director will alert the University's Senior Executive Vice President of Operations to facilitate further response, support, and coordination efforts with and among external emergency response entities and the larger community (*e.g.*, local law enforcement authorities, fire department, emergency medical services, disaster relief organizations). The Campus Security Authorities also will coordinate with the corporate office to assess the aftermath of the emergency event. The goal of this assessment is to identify and avoid any remaining danger or risk to the safety or well-being of students, staff, and visitors to the University's location. Should the Campus Director determine that an ongoing or continuing threat to the campus community exists, a campus-wide "timely warning" will be issued in a manner consistent with the policies discussed above.

The Campus Security Authorities will work to maintain order and take necessary steps towards restoring general campus operations. Subsequent informational notifications will be communicated to students and staff via email, online notifications, and campus postings. *E2Campus* will be used only in response to an immediate emergency situation and is not considered appropriate for follow-up communications once the immediate emergency situation has ended.

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Preparation and Readiness

The University will conduct annual tests of *E2Campus* to ensure preparedness in the event of an actual emergency. Such tests may be announced or unannounced, and may include email or text message test alerts, scheduled drills or exercises, and appropriate follow-through activities designed for assessment and evaluation of emergency plans and capabilities. Documentation of any such test is maintained at the University, and includes a description of the exercise, the date and time at which it occurred, and whether it was announced or unannounced.

Through periodic emergency response training, fire and evacuation drills, the posting of this Report on the University's website, and the distribution of notices regarding this Report to new and current students and employees, the University publicizes emergency response and evacuation procedures to students and staff on an at least annual basis.

VII. CRIME STATISTICS

Preparation of the Annual Disclosure of Crime Statistics

As noted at the outset of this Report, a key feature of this document is the disclosure of statistics regarding certain types of crimes reported to the University or local law enforcement. Each year the University prepares these statistics with assistance from its Regulatory Affairs division, and in cooperation with the University's Campus Security Authorities and local law enforcement agencies. When compiling and preparing the statistics disclosed in this Report, the University solicits, collects, and examines (1) crime data received from local law enforcement, (2) incident reports filed by any member of the University or the University's Campus Security Authorities, (3) anonymous reports received through the University's anonymous reporting system, and (4) records of referrals for discipline. The University collects and examines data for crimes and incidents reported during the prior calendar year.

Clery Geography and Crime Location

Consistent with federal regulations, the University examines, collects, and reports statistics for crimes that are reported to local police agencies or to a Campus Security Authority during the prior calendar year, and that occurred on or within its "Clery geography." The law defines an institution's Clery geography to include:

- Buildings and property that are part of the University's campus;
- The institution's non-campus buildings and property; and
- Public property within or immediately adjacent to and accessible from the campus.

When reporting crime statistics, the law requires an institution to specify in which of these three locations the reported crime occurred. In addition, institutions must identify, of the crimes that occurred on campus, the number that took place in dormitories or other residential facilities for students on campus.

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The University collects and reports crimes consistent with these requirements. However, because the University does not own or operate any (1) non-campus buildings or property or (2) dormitories or other residential facilities for students, statistics are not reported for these categories of location.

Crime Classification and Reporting

Consistent with federal law, the University compiles and classifies crime information in accordance with the following guidelines:

- Statistics for murder and non-negligent manslaughter, negligent manslaughter, rape, robbery, aggravated assault, burglary, motor vehicle theft, arson, liquor law violations, drug law violations, and illegal weapons possession are compiled using the definitions of those crimes from the *Summary Reporting System (SRS) User Manual* from the FBI's UCR Program.
- Statistics for fondling, incest, and statutory rape are compiled using the definitions of those crimes from the *National Incident-Based Reporting System (NIBRS) User Manual* from the FBI's UCR Program.
- Statistics for the hate crimes of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property are compiled using the definitions provided in the *Hate Crime Data Collection Guidelines and Training Manual* from the FBI's UCR Program.
- Statistics for dating violence, domestic violence, and stalking are compiled using the definitions set out earlier in this Report, which are taken from the federal regulations implementing the Clery Act.

Finally, in counting crimes when more than one offense was committed during a single incident, the University generally conforms to the requirements of the federal "Hierarchy Rule" located in the *Summary Reporting System (SRS) User Manual* (unless required to do otherwise under the law).

Though each year the University is only compiling crime statistics for crimes reported during the prior calendar year, the Report always includes the data for the three previous calendar years.

[See next page for Crime Statistics]

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CRIMINAL OFFENSES							
	On-Campus			Public Property			
	2016	2017	2018	2016	2017	2018	
Murder and Non-negligent manslaughter	0	0	0	0	0	0	
Negligent manslaughter	0	0	0	0	0	0	
Sex Offenses	0	0	0	0	0	0	
Sex offenses (Forcible)	0	0	0	0	0	0	
Sex offenses (Non-Forcible)	0	0	0	0	0	0	
Dating Violence	0	0	0	0	0	0	
Domestic Violence	0	0	0	0	0	0	
Stalking	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	
Aggravated assault	0	0	0	0	0	0	
Burglary	0	0	0	0	0	0	
Motor vehicle theft	0	0	0	0	0	0	
Arson	0	0	0	0	0	0	
Larceny-Theft	0	0	0	0	0	0	
Simple Assault	0	0	0	0	0	0	
Intimidation	0	0	0	0	0	0	
Destruction, Damage, Vandalism of Property	0	0	0	0	0	0	
Any other crime involving bodily injury	0	0	0	0	0	0	

Note, effective July 1, 2015, the Department of Education retired the “Sex offenses (Forcible)” and “Sex offenses (Non-Forcible)” reporting categories, and replaced them with a single “Sex Offenses” category. Under the old reporting system, Sex offenses (Forcible) included (1) forcible rape, (2) forcible sodomy, (3) sexual assault with an object, and (4) forcible fondling; and Sex offenses (Non-Forcible) included (1) incest and (2) statutory rape.

Under the new reporting system, the single category of “Sex Offenses” includes (1) rape, (2) fondling, (3) incest, and (4) statutory rape.

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HATE CRIMES							
	On-Campus			Public Property			
	2016	2017	2018	2016	2017	2018	
Murder and Non-negligent manslaughter	0	0	0	0	0	0	
Sex Offenses	0	0	0	0	0	0	
Sex offenses (Forcible)	0	0	0	0	0	0	
Sex offenses (Non-Forcible)	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	
Aggravated assault	0	0	0	0	0	0	
Burglary	0	0	0	0	0	0	
Motor vehicle theft	0	0	0	0	0	0	
Arson	0	0	0	0	0	0	
Larceny-Theft	0	0	0	0	0	0	
Simple Assault	0	0	0	0	0	0	
Intimidation	0	0	0	0	0	0	
Destruction, Damage, Vandalism of Property	0	0	0	0	0	0	
Any other crime involving bodily injury	0	0	0	0	0	0	

A hate crime is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender's bias. Although there are many possible categories of bias, under the Clery Act, only crimes motivated by one of the following eight categories of bias are reported: race, gender, religion, national origin, sexual orientation, gender identity, ethnicity, or disability. When reporting hate crimes, the University identifies the category of bias that motivated the crime.

ARRESTS AND REFERRALS FOR DISCIPLINARY ACTIONS

	On-Campus			Public Property		
	2016	2017	2018	2016	2017	2018
<i>Arrests</i>						
Illegal weapons possession	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0
<i>Disciplinary Actions and Judicial Referrals</i>						
Illegal weapons possession	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0