



Annual Security Report 2018

September 20, 2019

Urshan Graduate School of Theology (UGST) has participated in the Title IV Federal Direct Loan program since 2009. As a part of the Program Participation Agreement with the U.S. Department of Education, the Seminary must comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998, typically called the *Clery Act*, as well as the changes made to the *Clery Act* by the Higher Education Opportunity Act of 2008.

This Annual Security Report presents Urshan's security policies, procedures, and programs to the community and those considering the institution in their academic journey. The purpose of the report is to disclose security-related policies and reported crimes in compliance with federal mandates.

The institution prepares, publishes, and posts this report online by October 1 of each year. Anyone who wishes to receive a paper copy of the Annual Security Report may request one from the Admissions or Dean of Student Services Office.

On June 24, 2019, Urshan College (UC) was formally approved to participate in the Title IV Federal Direct Loan program as well. UC is not required to report *Clery* statistics until the 2020 reporting cycle.

Geography for Crime Reporting

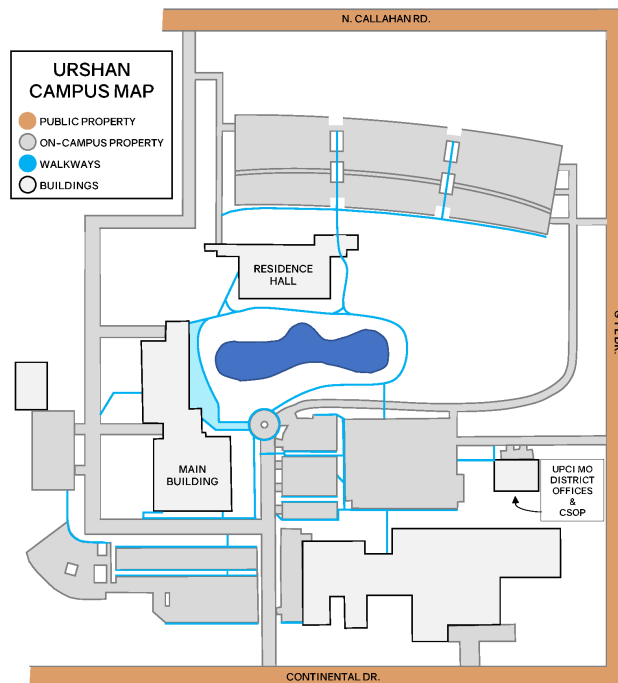
In compliance with the *Clery Act*, Urshan reports crime statistics that occur on campus, on public property within or immediately adjacent to the campus, and on or immediately adjacent to off campus locations used by the institution for school programs or overnight stays.

At this time of this report, UGST has no non-campus property or buildings under its ownership or control. Similarly, there are no off-campus properties frequently used by the Seminary for programs or overnight stays.

In 2018, UGST's on campus property included the entire first floor of the Urshan College dormitory wing, access areas, the library, and the parking lot. UGST's public property included the sidewalk

adjacent to the parking lot that runs parallel with Howdershell Road. The physical address for these areas included 700 and 704 Howdershell Rd. Florissant, MO 63031.

In June 2019, both UC and UGST moved to a new shared campus at 1151 CenturyLink Dr, Wentzville, MO 63385 (See new campus map below).



Any crimes that occur in these areas should be reported according to the procedures described in the Reporting and Collecting Crime Statistics section.

Reporting and Collecting Crime Statistics

The *Clery Act* requires the disclosure of certain types of reported crimes and that certain characteristics about the crimes be compiled. Urshan collects the reported data and coordinates investigations related to Title IX violations when needed. Local law enforcement is engaged for the investigation of alleged crimes that occur on campus. Currently Urshan has no official agreements with local police agencies; however, the Wentzville Police Department uses our campus for training purposes throughout the year. They also sit in our parking lots throughout the day and night.

Crimes that should be reported are classified into three categories:

- criminal offenses
- hate crimes
- arrests and referrals for disciplinary action

Criminal offenses to be reported are as follows:

- murder and non-negligent manslaughter
- negligent manslaughter
- forcible sex offenses
- non-forcible sex offenses
- robbery
- aggravated assault
- burglary
- motor vehicle theft
- arson

Hate crimes to be reported are any of the criminal offenses (listed above) plus any of the following:

- larceny-theft
- simple assault
- intimidation
- destruction/damage/vandalism of property that were motivated by bias.

A crime is considered to be motivated by bias if the motivation arose from a bias against the following:

- race
- gender
- religion
- sexual orientation
- ethnicity/national origin
- disability

Arrests and referrals for disciplinary action to be reported are those that result from the following:

- unlawful carrying, possession, or use of weapons
- drug abuse violations
- liquor law violations

When reporting a *Clery* crime, the following is recorded and disclosed:

- Where the crime occurred
- What type of crime occurred
- Who the crime was reported to
- When the crime occurred

How to Report Criminal Offenses

Whether you are student, faculty, staff, or guest, crimes should be reported promptly and accurately to the Dean of Student Services and local law enforcement. In the event of a life-threatening emergency, dial 911 from a landline or *55 from a cell phone. To report a non-life-threatening crime, call the Dean of Student Services at 314-838-8858, ext. 2123 and call the Wentzville Police Department at (636) 327-5105.

Voluntary Confidential Reporting

If you are the victim of or witness to a crime and do not want to pursue action within the institution or the criminal justice system, you may still want to consider making a confidential report. With your permission, a report can be filed without revealing your identity. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution. If a report is filed with a police agency, the report becomes public record. You may file a confidential report at the following online websites:

- UC <https://urshancollege.org/about/title-ix-policy/>
- UGST <https://ugst.edu/about/title-ix-policy/>

Disclosure of Crime Statistics

Crime statistics are compiled and reported annually to the U.S. Department of Education via the Campus Safety and Security Survey. The data is then published by the Office of Postsecondary Education and is accessible at <http://nces.ed.gov/collegenavigator>. This link is also posted to each school's website for prospective students and employees. At the end of this report are crime statistics reported by year and geographic location for the past three years.

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

Urshan will disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, in writing the results of any disciplinary hearing conducted by the institution 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, the institution will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Daily Crime Log

Urshan does not maintain campus police or a security department, so the institution does not maintain a daily crime log.

Emergency Notification and Timely Warnings

During orientation of new students and faculty/staff, emergency evacuation procedures are reviewed. Periodic emergency evacuation drills are conducted using the procedures described below.

Emergency Response

The Dean of Student Services will confirm when a situation is an emergency and will initiate the appropriate notification system through Populi texting system. If necessary, he/she will also notify the Wentzville Police Department.

The verbal announcement for an emergency situation is as follows:

- In case of an earthquake faculty and staff members will alert the individuals on their floor to move only a few steps to a nearby safe place, take cover under and hold onto a piece of heavy furniture or stand against an inside wall.
- In case of a tornado faculty and staff members will alert the individuals on their floor to move in a quick and orderly fashion to the basement of their respective buildings.
- In case of fire faculty and staff members will alert the individuals on their floor to evacuate in a quick and orderly fashion.

Emergency Evacuation Procedures

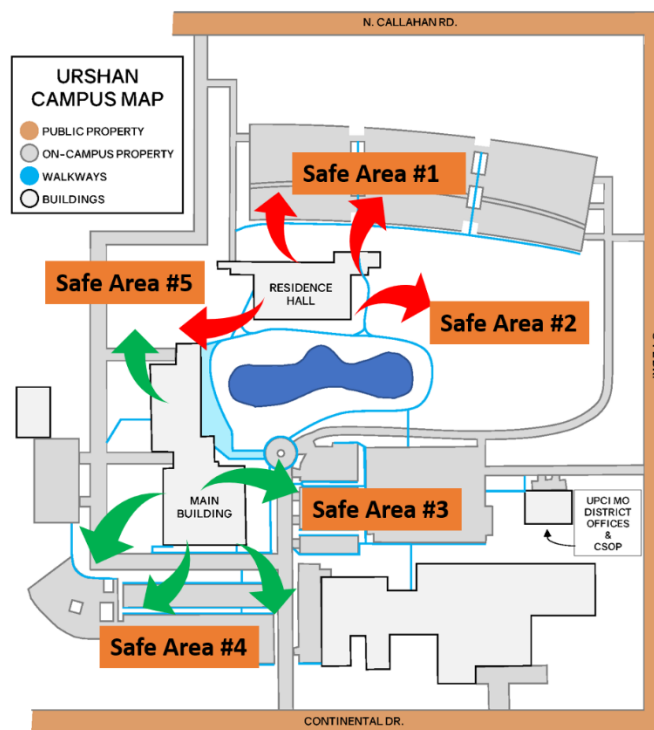
In the event of fire or other emergency, all faculty, staff, and students shall evacuate immediately.

- In the event of an emergency, faculty, staff, and students shall evacuate by means of the marked exit closest to their classroom.
- In the event of a fire, faculty and staff are authorized to use portable fire extinguishers to attempt to extinguish fires before evacuating.

Critical operations shutdown procedures are not required; therefore, no faculty, staff, or students are authorized to delay evacuation for this purpose.

No employees are assigned to perform medical or rescue duties during emergency evacuation situations.

After an emergency evacuation, faculty, staff, and students are to gather in the “safe areas” indicated on the map below:



All members of the Urshan Community should wait in one of the “safe areas” until the “all clear” is given to return to the building by emergency response teams, local law enforcement, the Dean of Student Services, or a facility representative.

After an emergency evacuation, the procedure for accounting for all employees is:

- Faculty and Staff: Report to Dean of Student Services
- Students: Roll call by Resident Assistants and Student Body Presidents

Timely Warning

A timely warning is not the same as an emergency notification. Timely warnings are issued to students, faculty and staff when deemed necessary after a report of criminal activity if the activity is considered serious or poses a continuing threat. The timely warning is designed to prevent further occurrence of similar crimes. The Dean of Student Services will determine when a timely warning is necessary, and when necessary, will send a timely warning notification text message and corresponding email to all enrolled students, faculty and staff. The Wentzville Police Department will communicate with the institution when a crime occurs that warrants a timely warning to the Urshan community.

Policy Statements

Security and Building Access

Urshan does not currently have a security department; however, exterior doors remain locked after business hours. Students, Staff, and Faculty are able to enter the building through the use of a key fob system that is placed on strategic doors around the campus that are under constant video surveillance.

Office hours are from 8:00 AM to 5:00 PM, Monday through Friday, during the school year. The building will be open during these times unless otherwise notified.

Students are permitted to use the Student Life Center and Library until curfew each night, unless otherwise notified by the Director of Library Services or Dean of Student Services.

Sexual Conduct Policy

During orientation of new students and faculty/staff, the sexual conduct policy is reviewed with students.

Urshan affirms that all persons, male and female, are created in the image of God, and are therefore entitled to be treated with honor, respect and love. Jesus Christ provides the supreme model for Christian relationships, requiring treatment of others with love and purity. Sexuality is a good gift of God that enhances the whole of life, yet scripture expressly limits expression of sexual intimacy to heterosexual, monogamous marriage. Violation of marriage vows through unfaithfulness or unbiblical divorce displeases God and damages others. Sexual intimacy outside marriage also violates God's standards, as may even words, attitudes, and thoughts (e.g., pornography). Sexual harassment is therefore also considered a sin, and one that is viewed in our society as a form of discrimination prohibited by federal law.

Any faculty or staff member that becomes aware of a violation of this code of conduct should inform the Dean of Student Services or Director of Spiritual Life/ Campus Pastor of their concerns. The Dean of Student Services or Director of Spiritual Life/ Campus Pastor will consult with the student, seeking positive resolution to the matter. If the matter cannot be resolved or is of such a nature that prompt dismissal is required, then the issue will be forwarded to the Student Disciplinary Committee.

Allegations of sexual misconduct or harassment will be treated as any other allegation of serious misconduct. Complaints will be immediately and thoroughly investigated. If it is determined that sexual misconduct or harassment has occurred, prompt and appropriate disciplinary action will be taken, up to and including termination (of an employee) and/or expulsion (of a student).

Urhsan will not retaliate or permit retaliation (including termination of employment) for bringing an allegation of sexual harassment or misconduct in good faith (i.e., not frivolously, maliciously or with vengeful intent).

Definitions

Sexual misconduct includes any violation of scriptural standards for sexual conduct and for violation of faithfulness to one's spouse (if married). Examples include, but are not limited to:

- Intimate sexual activity with and/or deep emotional attachment to a person other than one's legitimate spouse
- Intimate sexual activity by unmarried persons
- Sexual abuse of children
- Unbiblical separation or divorce and/or remarriage
- Collection, viewing, or use of pornography
- Homosexual sexual activity
- Sexual harassment

Sexual harassment includes any form of unwelcome or nonconsensual sexual advance, request for sexual favors, or other verbal or physical contact of a sexual nature or when any of the following is occurring:

- submission to such conduct is made explicitly or implicitly a condition of employment or academic standing
- submission to or rejection of such conduct is used as the basis for employment decisions or for academic evaluation, grades or advancement
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working or learning environment.

It may include, but is not limited to:

- Jokes
- Comments
- verbal "kidding" or abuse that is sexually oriented
- Suggestive, inappropriate or graphic comments about a person's body, appearance or actions
- Sexually suggestive gestures or actions, including physical actions such as patting, pinching, constant brushing against another's body, or blocking another's movement
- Subtle pressure for sexual activity or demands for sexual favors, whether or not accompanied by promise of reward or threat of punishment
- Sexual assault and/or rape
- Condoning any of the above

Procedures for Complaints of Sexual Harassment

Complaints of sexual harassment by or between students should be reported to the Dean of Students Services, David Reid, who also serves as the institution's Title IX Coordinator. Reports can be made in person or online at the following websites:

- UC <https://urshancollege.org/about/title-ix-policy/>
- UGST <https://ugst.edu/about/title-ix-policy/>

Complaints of sexual harassment by or between members of the faculty should be made to the Executive Vice President (EVP), Jennie Russell. If the complaint involves the EVP, then the complaint should be made to the Board of Directors. Reports can be made in person or online at the following websites:

- UC <https://urshancollege.org/about/title-ix-policy/>
- UGST <https://ugst.edu/about/title-ix-policy/>

All reports of sexual harassment are reviewed immediately to determine the proper course of action needed for the institution to remain compliant with its Title IX policy, as well as federal and state laws. The school reserves the right to seek council, as well as outsource any investigation that it deems necessary, to comply with these policies and the laws associated with them.

Alleged victims or offenders who feel that they have not been satisfactorily dealt with during this process may appeal to the Urshan President, Dr. Brent Coltharp, whose decision will be final. If the President has been involved already as accuser, accused or investigator, an appeal may be made instead to a committee set up by the chairman of Board of Directors, in which case the decision of the committee will be final.

Sex Offender Registration

In accordance to the "Campus Sex Crimes Prevention Act" of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne *Clery Act* and the Family Educational Rights and Privacy Act of 1974, Urshan is providing a link to the Missouri Sex Offender Registry. This act requires institutions of higher education to issue a statement advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice of each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. In the State of Missouri, convicted sex offenders must register with the Sex Offender Registry maintained by the Missouri State Highway Patrol. Unlawful use of the information for purposes of intimidating or harassing another is prohibited and willful violation shall be punishable as a Class 1 misdemeanor.

The Missouri State Highway Patrol is responsible for maintaining this registry. Follow the link below to access the Missouri State Highway Patrol website.

<http://www.mshp.dps.mo.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>

Alcohol and Drug Abuse Policy

The possession, use, and sale of alcohol and illegal drugs are governed by the Urshan Alcohol and Drug Abuse Policy and federal and state laws.

Laws regarding the possession, sale, consumption or furnishing of alcohol is controlled by the Missouri Division of Alcohol & Tobacco Control (ATC). The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. Federal and state laws are enforced by Urshan, and any violators are subject to institutional disciplinary action, criminal prosecution, fine and imprisonment.

Urshan is an alcohol and drug free campus. Students must refrain from using tobacco in any form, drinking alcoholic beverages, using illegal drugs, or abusing legal drugs.

Students and employees are advised of this policy at orientations and asked to comply with it via their code of conduct. Violation of the code of conduct will result in the institution imposing sanctions up to and including expulsion, termination of employment, and referral for prosecution.

Both students and employees may seek a referral for treatment from the Dean of Student Services, or may call the Center for Substance Abuse Treatment and Referral Hotline at 800-662-HELP (800-662-4357).

Missing Student Notification

Should the institution be notified of a missing student, the following procedures will be followed:

- If the student lives in student housing, the Resident Assistant (RA) will coordinate with the Housing Director and/or Dean of Student Services to collect as much information as possible on the situation, as well as perform a welfare checkup in the student's room if needed.
- If the student lives off-campus, the Dean of Student Services will enlist the assistance of local law enforcement, as well as collect as much information on the student's whereabouts through fellow students, teachers, and acquaintances connected to the institution.
- If the student is located, verification of the student's state of health and well-being will be conducted to determine if additional resources or assistance is needed.
- If the student is not located, the Dean of Student Services will notify the student's family, or emergency contact, within 24 hours of receiving a missing student notification.
- If the missing student resides off-campus, family members and friends are encouraged to file an official missing person's report with the local police department. The school will work with local law enforcement throughout the entire process.

Fire Safety Reporting

UGST does not have on campus student housing facilities, so the institution does not maintain a fire log, publish an annual fire safety report, or submit fire statistics to the Department of Education.

UC does have on campus student housing and will comply with this requirement in the 2020 Annual Security Report. To date, there have not been any reported fires on the Urshan campus, or in student housing.

Crime Statistics

Arrests - On-Campus	2016	2017	2018
Weapons: carrying, possessing, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0
Criminal Offenses - On-Campus	2016	2017	2018
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Hate Crimes - On-Campus	2016	2017	2018
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Larceny-Theft	0	0	0
Simple assault	0	0	0
Intimidation	0	0	0
Destruction/Damage/Vandalism of property	0	0	0
Arrests - Public Property	2016	2017	2018
Weapons: carrying, possessing, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0
Criminal Offenses - Public Property	2016	2017	2018
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Hate Crimes - Public Property	2016	2017	2018
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0

Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Larceny-Theft	0	0	0
Simple assault	0	0	0
Intimidation	0	0	0
Destruction/Damage/Vandalism of property	0	0	0