

# 2025 ANNUAL SECURITY AND FIRE SAFETY REPORT

INFORMATION FOR THE 2025-26 YEAR, INCLUDING CRIME AND FIRE STATISTICS  
FOR CALENDAR YEARS 2022-24



URSHAN UNIVERSITY  
& GRADUATE SCHOOL OF THEOLOGY

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## INTRODUCTION

This report is published in compliance with the Jeanne Clery Campus Safety Act as amended by the Campus Crime Statistics Act, the Higher Education Opportunity Act of 2008, and the Violence Against Women Act (VAWA) of 2013. It includes information on campus crime and fire statistics, institutional policies, and resources for campus community members.

The Clery Act originated in 1990 when Congress enacted the Crime Awareness and Campus Security Act, requiring postsecondary institutions participating in Title IV federal financial aid programs to disclose campus crime statistics and security information. The law has been amended several times, most recently in 2013 with VAWA, which added requirements for tracking and reporting incidents of dating violence, domestic violence, sexual assault, and stalking, as well as related prevention and response policies. The 1998 amendments renamed the law in memory of Jeanne Clery, a college student who was murdered in her residence hall in 1986.

Email notification of the publication of the *Annual Security and Fire Safety Report* is sent to faculty, staff, and enrolled students no later than October 1 of each year.

The report is available for viewing and download on Urshan University's website at <https://urshan.edu/clery-act-disclosure>. Printed copies may be obtained from the Office of Student Services (Fourth Floor, Durr Administration Building, 155 Urshan Way, Wentzville, Missouri), or from Campus Security ([security@urshan.edu](mailto:security@urshan.edu)).

Copies are also available upon request from the Office of Admissions (for prospective students) or the Office of Human Resources (for prospective employees).

All policy statements in this report apply to all campuses unless otherwise indicated. Questions regarding the content of this report should be directed to the Clery Coordinator.

### Campus Security

Urshan University (UU) and Graduate School of Theology (UGST) established its first Security Department in July 2025 with the hiring of a full-time Access Control Supervisor. This marked the beginning of a dedicated security presence on campus. The Security Department operates under the Office of Student Services and works in close partnership with the Wentzville Police Department, with whom Urshan maintains a written Memorandum of Understanding (MOU).

All Urshan security officers are licensed through the Eastern Missouri Police Academy, meeting the St. Charles County's standards for operational security officers. While they

are not sworn law enforcement officers, their county-issued security licensure grants them limited arrest authority under the permissions established by St. Charles County.<sup>1</sup>

Security services are available 24 hours a day, seven days a week (excluding holidays). The Access Control Supervisor provides regular patrols of campus facilities, with increased monitoring during evening and curfew hours. If security personnel are actively engaged in a case, temporarily unavailable, or if the campus is closed, responsibility for patrolling and responding to emergencies falls to the local police agencies with jurisdiction over the campus area.

In addition to enforcement of federal, state, and local laws as well as Urshan University policies, security services include:

- Emergency response assistance in cases of injury or severe illness
- Safety escorts to vehicles or between campus buildings
- On-call response to calls for service or assistance
- Support during emergencies and coordination with local law enforcement when needed
- Crime reporting services for students, staff, and visitors (reports are documented and forwarded to appropriate university officials and the Wentzville Police Department when necessary)
- Parking enforcement and monitoring of campus facilities to support safety and access control
- Trespass response, including asking unauthorized individuals to leave campus property and contacting Wentzville Police for enforcement if needed

Campus Security cooperates with and assists outside agencies (including the Wentzville Police Department and other local law enforcement partners) when incidents involving students, employees, or visitors are brought to the University's attention, even if the alleged offense occurs off-campus. Reports received from outside police agencies regarding Urshan students being involved in criminal behavior or violations of the Urshan Student Code of Conduct may be forwarded to the Office of Student Services or Campus Security for internal investigation. University sanctions range from a verbal reprimand to permanent expulsion.

The University does not have any officially recognized student organizations that own or control housing facilities outside of the campus. Therefore, Urshan does not rely on local police departments to monitor and record criminal activity for non-campus student organization locations, since no such locations exist.

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<sup>1</sup> This section was updated December 11, 2025, to reflect important updates regarding Campus Security operations.

As the department continues to develop, Urshan remains committed to strengthening campus safety and security resources while maintaining a close working relationship with local police authorities.

## Where to Report a Crime and Other Emergencies

Students, employees, visitors, and community members are strongly encouraged to promptly and accurately report all crimes, public safety-related incidents, and emergencies to Campus Security and/or the Wentzville Police Department (WPD). This includes situations where victims elect to report or are unable to report on their own, as well as suspicious behavior or other emergencies at the following locations:

- On campus
- On public property running through and immediately adjacent to the campus
- On other property owned or controlled by Urshan
- In areas near campus

Calling 911 from a cellular device will connect the caller to the St. Charles County Department of Emergency Communications.

To maximize campus safety, Urshan strongly encourages anyone with knowledge of any crime (whether as a witness or victim) to make an immediate report to Campus Security or by calling 911. Reporting a crime does not mean legal action must be taken; however, it helps law enforcement prevent further incidents, keeps the community informed, and ensures resources are available to those affected.

### Reports to Campus Security may be made:

- In person during University business hours (8:00 a.m. to 5:00 p.m., Monday through Friday, excluding holidays); Office located in Building H
- By phone, voicemail, or text at **720-975-6855**
- By email at [security@urshan.edu](mailto:security@urshan.edu)

### Reporting a Non-Life-Threatening Crime:

To report a non-life-threatening crime, contact:

- Campus Security, by any of the methods listed above
- The Office Student Services at 314-838-8858, ext. 2123 or [studentservices@urshan.edu](mailto:studentservices@urshan.edu)
  - Victims of sexual discrimination or sexual violence may also report directly to [title9@urshan.edu](mailto:title9@urshan.edu)
- The Wentzville Police Department Non-Emergency Line at 636-327-5105

## Response to A Report

When a Clery-reportable crime is reported, the following information is documented and may be disclosed:

- Location of the crime
- Type of crime
- Recipient of the report (who the crime was reported to)
- Date and time the crime occurred

This documentation ensures accurate reporting for annual statistical disclosures and timely warning assessments. All reported crimes will be investigated by Urshan and may become a matter of public record.

WPD dispatchers are available 24/7. Upon receiving a call, WPD will either dispatch an officer or request the victim to report in person to file an incident report. All reported crimes are investigated and may become a matter of public record. The WPD is responsible for investigating crimes and other public safety emergencies. If assistance from the Wentzville Fire Department is needed, 911 dispatchers will notify them immediately.

All reports involving students that are made to Urshan officials are reviewed and assessed to determine the appropriate next steps.

#### **Reports to Campus Security:**

When a crime or suspicious activity is reported to Campus Security, the report is evaluated to determine whether further action or investigation is necessary. If an investigation is warranted, Campus Security will respond and take the appropriate steps. Regardless of whether an investigation occurs, all reports are forwarded to the Clery Coordinator for recordkeeping and ASR inclusion assessment.

If a sexual assault or rape should occur, personnel responding to such incidents will provide victims with access to a variety of support services and resources.

#### **Reports to Urshan Officials:**

Reports made to Urshan employees, including Student Services personnel, Residence Life staff (e.g. Resident Assistants), or other designated Campus Security Authorities, are forwarded to the Clery Coordinator and the Office of Student Services for review. The Office of Student Services (referring to the Director of Student Services and Associate Director of Student Services) works with Campus Security to ensure accurate documentation, compliance with reporting requirements, and assessment for any necessary institutional response.

All reports are ultimately reviewed by the Clery Coordinator to determine inclusion in the ASR and whether a Timely Warning should be issued to the campus community.

### **Reporting to Meet Disclosure Requirements**

Members of the community can assist in maintaining campus safety when they immediately report crimes or emergencies to Campus Security and/or the offices listed

below. Such reports help determine whether a Timely Warning should be issued and ensure that incidents are accurately included in the annual statistical disclosure.

Rachelle Holbrook  
*Associate Director of Student Services & Clery Coordinator*  
Durr Administration Building, Room 417  
314-838-8858 ext. 2117  
rholbrook@urshan.edu

Jereme Watson  
*Director of Student Services & Title IX Coordinator*  
Durr Administration Building, Room 418  
314-838-8858 ext. 2123  
studentservices@urshan.edu OR title9@urshan.edu

Alec Noriega  
*Access Control Supervisor*  
Building H Security Office  
720-975-6855  
security@urshan.edu

Urshan strongly encourages the accurate and prompt reporting of all crimes to Campus Security, the offices listed above, and/or the Wentzville Police Department, or other appropriate police agencies, even when the victim of a crime elects not to or is unable to report.

## **Campus Security Authorities**

Campus Security Authorities (CSA) are designated based on their roles in student life. They are individuals most likely to have ongoing, close contact with students and from whom students may seek advice or assistance in the event a crime is committed.

CSAs are required to report any crimes reported to them to the Clery Coordinator. Crimes reported to a CSA and forwarded to the Clery Coordinator or Campus Security are reviewed and assessed for inclusion in the crime statistics for the ASR and if a timely warning should be issued.

Some employees and student workers are designated as CSAs by default because of their positions within Urshan University & Graduate School of Theology. These include, but are not limited to:

- Campus security officers and Security Department personnel

- Student Services staff (the Director and Associate Director also serve as Title IX Coordinator and Clery Coordinator, respectively)
- Residence Life staff, including Resident Assistants
- The campus counselor (*who, by law, is not required to disclose information shared during counseling*)
- Human Resources staff

Other individuals are designated as CSAs because their role on campus creates a special relationship with students. The most common example of this category is faculty advisors for student organizations and clubs, as their work naturally fosters close relationships with organization members.

Because institutional roles and job duties may change, Urshan University will review and update its list of designated CSAs each academic year. Identified CSAs are notified of their designation and provided training on the role and their responsibilities.

## **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 through the criminal justice system, you may still want to consider making a confidential report. With your permission, a Campus Security Officer or another CSA can file a report that includes the details of the incident without revealing your identity (except to the Title IX Coordinator in the event of a reported sex offense, sexual harassment, or bias-related incident).

The purpose of a confidential report is to comply with and respect the victim's wish to keep the matter confidential while taking steps to protect the future safety of themselves and others (i.e. the campus community). With such information, UU and UGST can keep an accurate record of the number of incidents involving students, employees and visitors; determine where there is a pattern of crime with regard to a particular location, method, or assailant; and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution.

## **Pastoral and Professional Counselors**

For Clery Act purposes, pastoral counselors and professional counselors, when acting in their roles, are not considered CSAs and are therefore not required to report crimes for inclusion in the ASR.

As a matter of policy, the professional counselors at both UU and UGST are encouraged, when it is deemed appropriate, to inform those they counsel of procedures for voluntarily and confidentially reporting crimes for inclusion in the annual crime

statistics. This process allows crimes to be recorded in the institution's statistical disclosure without compromising confidentiality.

Clery defines pastoral counselors and professional counselors as:

**Pastoral Counselor:** An employee of an institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling and who is functioning within the scope of that recognition as a pastoral counselor.

**Professional Counselor:** An employee of an institution whose official responsibilities include providing psychological counseling to members of the institution's community, and who is functioning within the scope of his or her license or certification.

UU does not currently have a pastoral counselor on staff or utilize any active, qualifying employees for this role but does employ a professional counselor with an office on campus. UGST has a Director of Spiritual Life who can serve in a pastoral counselor role.

## Disclosures of Hearing Outcomes to Alleged Victims of Crimes of Violence

Urshan will, upon written request, disclose in writing to the alleged victim of a crime of violence or a non-forcible sex offense 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 requested.

## Daily Crime Log

The purpose of the Daily Crime Log is to record all criminal incidents and alleged criminal incidents that are reported to Campus Security, the Clery Coordinator, or any CSA.

The crime log includes:

- the date the crime was reported
- the date and time the crime occurred
- the nature of the crime
- the general locations of the crime
- the disposition of the complaint
- the incident number

The Daily Crime Log is maintained by the Office of Student Services. The log for the most recent 60 days is available for public view at the reception desk or the Office of

Student Services during normal business hours (8:00 a.m. to 5:00 p.m., Monday through Friday, excluding holidays). Logs for periods prior to the most recent 60 days are also available for review during business hours but must be requested at least two business days in advance.

## CRIME STATISTICS

### Preparation of the Annual Crime Statistics

The information below provides context for the crime statistics reported as part of our compliance with the Clery Act. The Annual Security Report includes crime data reported directly to the Clery Coordinator, as well as statistics obtained from the Wentzville Police Department, as required by the Clery Act. While the Clery Coordinator formally requests crime information from outside law enforcement agencies in writing, not all jurisdictions may respond. All information received is included in the ASR.

Annually, written requests for statistical information are sent to all Campus Security Authorities, as well as to University deans, directors, and department heads. The Title IX Coordinator may also provide statistics to the Clery Coordinator regarding cases reported directly to that office when victims choose not to report incidents to Campus Security or local law enforcement.

The Annual Security Report presents data from the previous three years and organizes crime statistics according to three geographic categories: On-Campus; Non-Campus (buildings or property leased or controlled by the institution); and Public Property that is within or immediately adjacent to, and accessible from, On-Campus locations. The crime tables show the number of reported incidents for each offense category over the preceding three calendar years, organized by these geographic classifications. Campus Geography is explained in detail in the following section.

#### **The Clery Act requires campuses to include four general categories of crime statistics:**

- **Criminal Offenses:** Criminal homicide, including murder and non-negligent manslaughter, manslaughter by negligence; sexual assault including rape, fondling, incest, and statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; and arson.
- **Hate Crimes:** Any of the above criminal offenses, as well as incidents of larceny or theft, simple assault, intimidation, or destruction/damage/vandalism of property, that were motivated by bias.
- **VAWA Offenses:** Any incidents of domestic violence, dating violence, and stalking. (*Note: Sexual assault is also a VAWA offense but is included in the Criminal Offenses category for Clery Act reporting purposes*).
- **Arrests and Referrals for Disciplinary Action:** Violations of weapon (carrying, possessing, using, etc.), drug abuse, and liquor laws. In this context, “referred for disciplinary action” refers to the referral of any person to any official who

initiates a disciplinary action of which a record is established and which may result in the imposition of a sanction.

The statistics are published in accordance with the standards outlined in the FBI Uniform Crime Reporting (UCR) program and applicable federal and state laws. Urshan also submits the annual crime statistics published in this report to the U.S. Department of Education via the Campus Safety and Security Survey. The information collected is publicly accessible on the Department of Education's website (<https://ope.ed.gov/campusafety>).

The report is available for viewing and download on Urshan University's website at <https://urshan.edu/clery-act-disclosure>. Printed copies may be obtained from the Office of Student Services (Fourth Floor, Durr Administration Building, 155 Urshan Way, Wentzville, Missouri), or from Campus Security ([security@urshan.edu](mailto:security@urshan.edu)).

Copies are also available upon request from the Office of Admissions (for prospective students) or the Office of Human Resources (for prospective employees).

## Definitions of Geography

### On-Campus

Any building or property owned or controlled by an institution within the same reasonable contiguous geographic area of the institution and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to the identified area of this definition that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes.

To further define an "On-Campus" location, the following criteria are applied: the location provides classes in an organized program of study and have at least one person on site serving in an administrative capacity. Urshan's On-Campus areas include all buildings and properties owned or controlled by the University within the area located at 155 Urshan Way, Wentzville, Missouri. University-owned or controlled properties located immediately outside this boundary are also classified as On-Campus. Urshan's sole On-Campus location is in St. Charles County, which includes the residential hall, Building C, located at 120 Apostolic Way, Wentzville, Missouri.

### Non-Campus Building or Property

Any building or property owned or controlled by a student organization officially recognized by the institution, or any building or property (other than a branch or separate campus) owned or controlled by the institution that is used in direct support of, or in relation to, the institution's educational purposes, is used by students, and is not within the same reasonably contiguous geographic area of the institution.

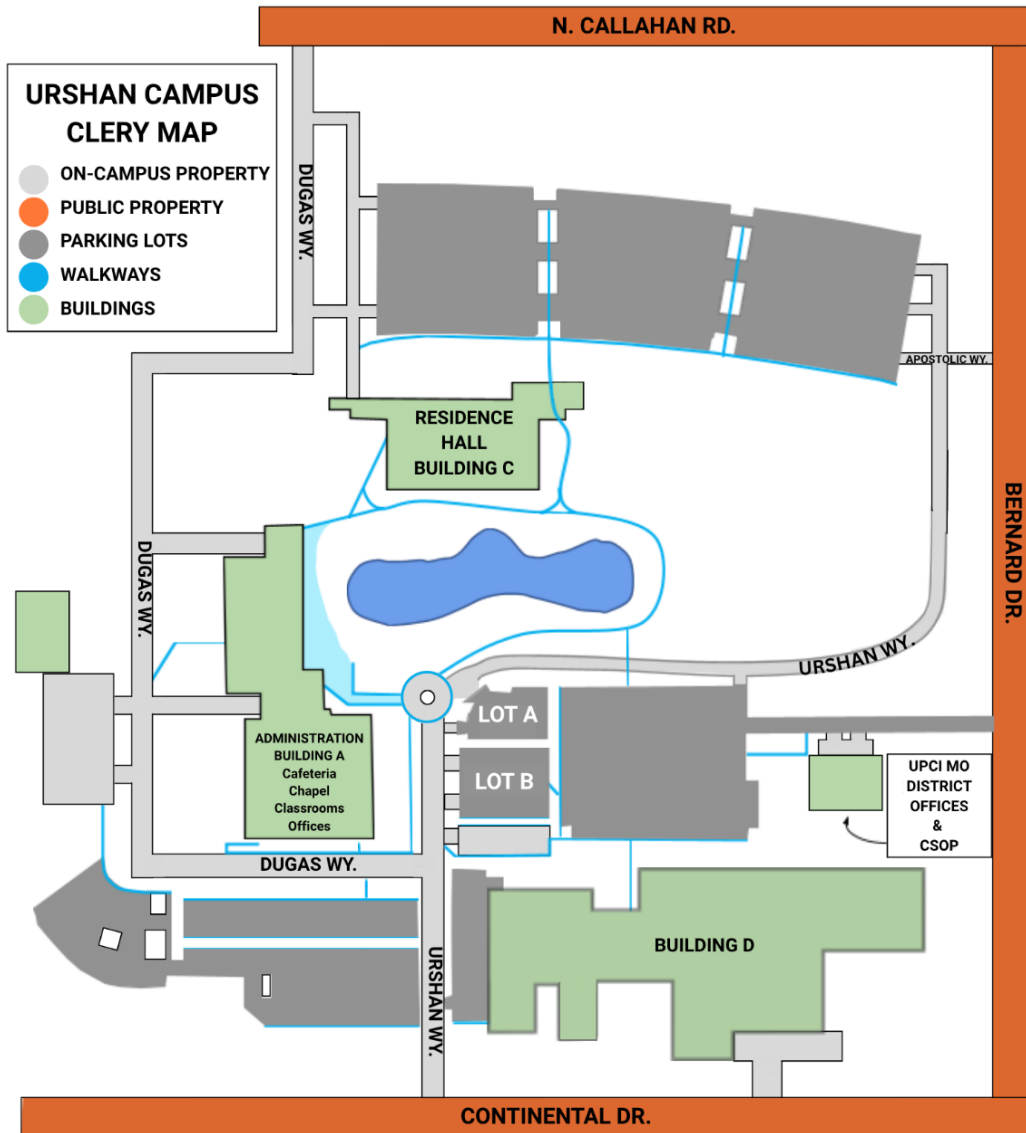
This category also includes lodging (e.g. hotels) where students stay for more than one night for athletic, academic, or student organization travel, or locations that are used consistently every year. All Non-Campus crimes are reported in the crime statistics chart. Currently, the only location included in this category is the off-campus residence hall, Building H, located at 900 Corporate Parkway, Wentzville, Missouri.

### **Public Property**

All public property, including thoroughfares, streets, sidewalks, etc. that are within the campus or immediately adjacent to and accessibly from the campus.

Urshan's crime statistics do not include incidents that occur in privately owned homes or businesses located within or adjacent to campus boundaries. Public property refers specifically to property owned by a government entity (e.g. city, county, or state).

# Clery Map



## CRIME DEFINITIONS (FEDERAL/CLERY DEFINITIONS)

Listed in Clery hierarchy order.

### **Murder and Non-Negligent Manslaughter**

The willful (non-negligent) killing of one human being by another.

### **Manslaughter by Negligence**

The killing of another person through gross negligence.

### **Sexual Assault (Sex Offenses)**

Sexual assault means an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the *National Incident-Based Reporting System User Manual* from the FBI UCR program, a sex offense is any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

### **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 his/her age or because of his/her temporary or permanent mental incapacity.

### **Incest**

Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law (see State of Missouri definitions in a later section; RSMo §568.020).

### **Statutory Rape**

Nonforcible sexual intercourse with a person who is under the statutory age of consent (which is 17 in the State of Missouri; RSMo §566.034).

### **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 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. It is not necessary that injury result from an aggravated assault when a weapon is used which could and probably would result in a serious personal injury if the crime were successfully completed.

### **Burglary**

The unlawful entry of a structure to commit a felony or a theft. Attempted forcible entry is included. For Clery reporting purposes, this includes unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

### **Motor Vehicle Theft**

The theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on land surface and not on rails (motorboats, construction equipment, airplanes, and farming equipment are specifically excluded from this category). All cases where automobiles are taken by persons not having lawful access, even though the vehicles are later abandoned, including joy riding, are classified as motor vehicle theft.

### **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**

A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. A hate crime is not a separate, distinct crime, but is the commission of a criminal offense which was motivated by the offender's bias. The following eight categories are reported: race, religion, sexual orientation, gender, gender identity, ethnicity, nation origin, and disability.

Offenses classified as hate crimes include all listed Clery-reportable crimes, as well as larceny/theft, simple assault, intimidation, and destruction, damage, and/or vandalism of property. Violations of weapon, drug, and liquor laws are not included in hate crime statistics.

### **Larceny/Theft**

The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession, of another person. Constructive possession is the condition in which a person does not have physical custody or possession, but is in a position to exercise dominion or control over a thing,

### **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 aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

### **Intimidation**

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.

### **Destruction/Damage/Vandalism of Property**

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.

### **VAWA**

Any incidents of domestic violence, dating violence, and stalking. *Note: Sexual assault is also a VAWA offense but is included in the Criminal Offenses category for Clery Act reporting purposes.*

### **Domestic Violence**

A felony or misdemeanor crime of violence committed by any of the following individuals:

1. a current or former spouse of intimate partner of the victim,
2. a person with whom the victim shares a child in common,
3. a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner,
4. 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, OR
5. any other person against an adult or youth victim who is protected from that person's acts under the domestic or family laws of the jurisdiction in which the crime of violence has occurred (see State of Missouri definitions in a later section; RSMo §455.010).

### **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.

### **Stalking**

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer substantial emotional distress (see State of Missouri definitions in a later section; RSMo §565.225).

- *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, following, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.
- *Reasonable person* means a 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.

### **Weapon Law Violations (Carrying, Possessing, etc.)**

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.

### **Drug Abuse Law 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. The relevant substances include opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics/manufactured narcotics that can cause true addiction (Demerol, methadone); and dangerous nonnarcotic drugs (barbiturates, Benzedrine).

### **Liquor Law Violations**

The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, including: maintaining unlawful drinking places; bootlegging, operating a still; furnishing liquor to a minor; using a vehicle for illegal transportation of liquor; open alcohol in a motor vehicle; consumption of alcohol in public; and other related offenses. Driving under the influence and drunkenness are not included in this definition, except when the individual is under the age of 21 and possession by consumption is determined in accordance with Missouri law (RSMo §311.325).

### **Disciplinary Referrals (Referred for Disciplinary Action)**

The referral of any person to any official who initiates a disciplinary action of which a record is established and which may result in the imposition of a sanction.

### **Hazing Incidents (Future Reporting)**

In accordance with the recently amended Clery Act under the *Stop Campus Hazing Act* (signed into law December 2024), institutions are required to begin collecting and reporting statistics on hazing incidents starting January 1, 2025. Accordingly, hazing

counts will first appear in Urshan’s 2026 Annual Security Report, which reflects 2025 statistics. The Act also requires institutions to maintain hazing policies, implement prevention and awareness programs, and publish a Campus Hazing Transparency Report detailing findings related to violations of hazing standards. The first transparency report must be publicly available by December 23, 2025.

The SCHA defines the term “hazing”, for purposes of reporting statistics on hazing incidents as any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons), against another person or persons regardless of the willingness of such other person or persons to participate, that is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury.

Please refer to the Hazing Policies & Prevention Programs section for extensive definitions.

## CRIME STATISTICS 2022–2024

Criminal Offenses Reporting Table		Geographic Locations			
Offense (Crimes Reported by Hierarchy)	Year	On-Campus Property	Non-Campus Property	Public Property	Total
Murder/Non-Negligent Manslaughter	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Manslaughter by Negligence	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Rape	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Fondling	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Incest	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Statutory Rape	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Robbery	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Aggravated Assault	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Burglary	2022	0	0	0	0
	2023	2	0	0	2
	2024	0	0	0	1 <sup>2</sup>
Motor Vehicle Theft	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Arson	2022	0	0	0	0
	2023	1	0	0	1
	2024	0	0	0	0

<sup>2</sup> This count was updated January 7, 2026, following a records review where the institution identified a Clery-reportable burglary occurring during Fall 2024 that was not previously included. Although the incident was investigated at the time and no suspect was identified, the report constitutes a good-faith allegation of burglary under the Clery Act. The incident has now been properly classified and included in the applicable crime statistics, and this Annual Security Report has been corrected and redistributed accordingly.

Hate Crimes: There were no reported hate crimes in 2022, 2023, and 2024.

Unfounded Crimes: There were no unfounded reports in 2022, 2023, or 2024.

<b>VAWA Offenses Reporting Table</b>		<b>Geographic Locations</b>			
<b>Offense</b>	<b>Year</b>	<b>On-Campus Property</b>	<b>Non-Campus Property</b>	<b>Public Property</b>	<b>Total</b>
Domestic Violence	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Dating Violence	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Stalking	2022	1	0	0	1
	2023	0	0	0	0
	2024	0	0	0	0

<b>Arrests and Disciplinary Referrals Reporting Table</b>		<b>Geographic Locations</b>			
<b>Offense</b>	<b>Year</b>	<b>On-Campus Property</b>	<b>Non-Campus Property</b>	<b>Public Property</b>	<b>Total</b>
Weapon Law Arrests (Carrying, Possessing, etc.)	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Drug Abuse/Law Arrests	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Liquor Law Arrests	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Weapon Law Violations Referred for Disciplinary Action (Carrying, Possessing, etc.)	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Drug Abuse/Law Violations Referred for Disciplinary Action	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	2022	0	0	0	0
	2023	0	0	0	0
	2024	0	0	0	0

# NOTIFICATIONS

## Timely Warnings

Timely Warning Notices are issued to alert the campus community about crimes or situations that may pose a serious or continuing threat to students, employees, or visitors. Timely Warnings are intended to aid in the prevention of similar crimes and are distributed as soon as pertinent information is available. Notices are written to protect the confidentiality of victims while providing enough detail to safeguard the community.

If a crime is reported within UU's Clery Geography (On-Campus, Non-campus property, Public Property), and, in the judgment of Campus Security and/or his designee, the Clery Coordinator, and/or senior campus administrators (when time permits), the incident is determined to present a serious or ongoing risk, a campus-wide Timely Warning will be distributed.

Each situation is evaluated on a case-by-case basis, considering:

- The nature of the crime
- The potential for continued danger to the community
- The possible risk of compromising law enforcement efforts

Timely Warnings are not limited to violent crimes. They are typically issued for the following Uniform Crime Reporting Program (UCR) or the National Incident-Based Reporting System (NIBRS) crime classifications:

- Murder/Non-Negligent Manslaughter
- Aggravated Assault
  - Reported cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case-by-case basis to determine if the individual is believed to be an ongoing threat to the larger UU community).
- Robbery involving force or violence
  - Cases including pickpocketing and purse snatching will typically not result in the issuance of a Timely Warning but will be assessed on a case-by-case basis.
- Sexual Assault
  - Considered on a case-by-case basis depending on the facts of the case, when and where the incident occurred, when it was reported, and the amount information known by Campus Security, the Office of Student Services, or designee.
  - In cases involving sexual assault, they are often reported long after the incident occurred, thus there is no ability to distribute a "timely" warning notice to the community.

- All cases of sexual assault, including stranger and non-stranger/acquaintance cases, will be assessed for potential issuance of a Timely Warning.
- Major incidents of Arson
- Other Clery crimes as determined necessary by Campus Security, the Office of Student Services, or designee.

Timely Warnings may also be posted for other crime classifications and locations, even though that is not required by the law, at the sole discretion of Urshan.

The Office of Student Services, in consultation with Campus Security, determines when a Timely Warning is necessary. When issued, notifications are typically written and distributed by the Office of Student Services or its designee and are sent via text message and email through the University's Populi alert system to all enrolled students, faculty, and staff.

The institution is not required to issue a Timely Warning with respect to crimes reported to a pastoral or professional counselor.

## **Emergency Notification**

Urshan's mass notification system (Populi) is used to rapidly notify the campus community in the event of a significant emergency or dangerous situation imminently impacting the safety or security of the University area.

While it is impossible to predict every significant emergency or dangerous situation that may occur on campus, the following identified situations are examples that may warrant an emergency (immediate) notification after confirmation: armed/hostile intruder; bomb/explosives (threat); communicable disease outbreak; severe weather; terrorist incident; civil unrest; natural disaster; hazardous materials incident, and structural fire.

In the event of an emergency, Urshan will initiate and provide, without delay, immediate notifications to the appropriate segment(s) of the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees, or visitors.

If an emergency affects our On-Campus locations, Campus Security and/or the Office Student Services or designee, in conjunction with other senior administrators, local first responders, Health Department, and/or the National Weather Service, will be responsible for confirming the significance, danger level, and immediate threat to the safety and security of the campus community.

The Office of Student Services and Executive Vice President will collaborate to

determine the content of the notification and will use some or all of the systems described below to communicate the threat to the UU Community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

Upon confirmation of the threat or danger, Urshan will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the responsible authorities (Campus Security, WPD, etc.) compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Notification will be made by using some or all the following methods depending on the type of emergency: Populi communications system (which contains email and cell phone text messaging), posted notices in buildings, fire alarm activation (where available), social media and/or webpage (coordinated by the Director of Marketing), and face-to-face communication may be used if necessary.

Any required notifications to the larger community (outside UU's area) will be coordinated by the Office of Student Services, in consultation with Campus Security.

### **Managing Contact Information for Notification**

University email addresses and primary telephone numbers are uploaded to the Populi alert system during the admissions or hiring process. Community members may add additional telephone numbers or email addresses, or request their addition, to ensure they receive emergency notifications.

When logged into the Populi community portal, users can:

1. Click the "My Profile" tab, then select "Info" to view, update, or add to their contact information for email and text notifications.
2. To verify alert subscriptions, click the notification bell icon in the upper-right corner, select the three dots in the window that appears, and choose "Notification Settings." From there, users can confirm they are subscribed to receive text alerts.

Students, faculty, and staff are encouraged to keep their contact information current and provide additional contact methods whenever possible to improve the University's ability to deliver timely notifications.

The local news media may be utilized to disseminate emergency information to members of the larger community, including campus neighbors, parents, and other interested parties. The larger community can also access emergency information via the institution's website and/or social media.

If there is an immediate threat to the health or safety of students or employees

occurring on campus, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a Timely Warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.

As of September 2025, Urshan is finalizing a contract with a campus safety and emergency notification app provider. This partnership is intended to strengthen Urshan's ability to deliver timely and effective safety alerts, streamline compliance with Clery Act requirements, and expand communication options for the entire campus community, including students, faculty, staff, guests, visitors, contractors, and vendors present on campus.

Direct questions or concerns regarding the mass notification system to the Clery Coordinator at 314-838-8858, ext. 2117 or by email at [rho1brook@urshan.edu](mailto:rho1brook@urshan.edu).

## **EMERGENCY RESPONSE AND EVACUATION PROCEDURES**

UU maintains an Emergency Response Plan that outlines responsibilities of campus units during emergencies. This plan outlines incident priorities, campus organization and specific responsibilities of particular units or positions.

University units are responsible for developing emergency response and continuity of operations plans for their areas and staff. Campus Security and the Office of Student Services provide resources and guidance for the development of these plans.

In conjunction with other emergency agencies, the University conducts tests of the Emergency Response Procedures throughout the academic year. Tests, which consist of drills, are designed to evaluate specific segments of the Emergency Response Plan. Drills may be announced or unannounced, and may involve the entire campus, or focus on a specific area (such as a particular residence hall). Each test is documented in a report and includes a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.

The campus publicizes a summary of the emergency response and evacuation procedures via email at least once each year in conjunction with a test (exercise and drill) that meets all of the requirements of the Higher Education Opportunity Act.

### **Emergency Evacuation Procedures**

During student orientation each semester, emergency procedures and safety drills are reviewed, and informational handouts are distributed. Faculty and staff review

these procedures periodically. Evacuation route maps and signage are also posted throughout campus to assist in the event of an emergency.

Emergency evacuation procedures are tested twice a year through scheduled drills. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each faculty for a short-term building evacuation.

The Emergency Response Team does not tell building occupants in advance about the designated locations for long-term evacuations because those decisions are affected by the 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, Campus Security and Student Services staff on scene will communicate information to campus community members including students, faculty, and staff 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 another emergency. At Urshan, 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.

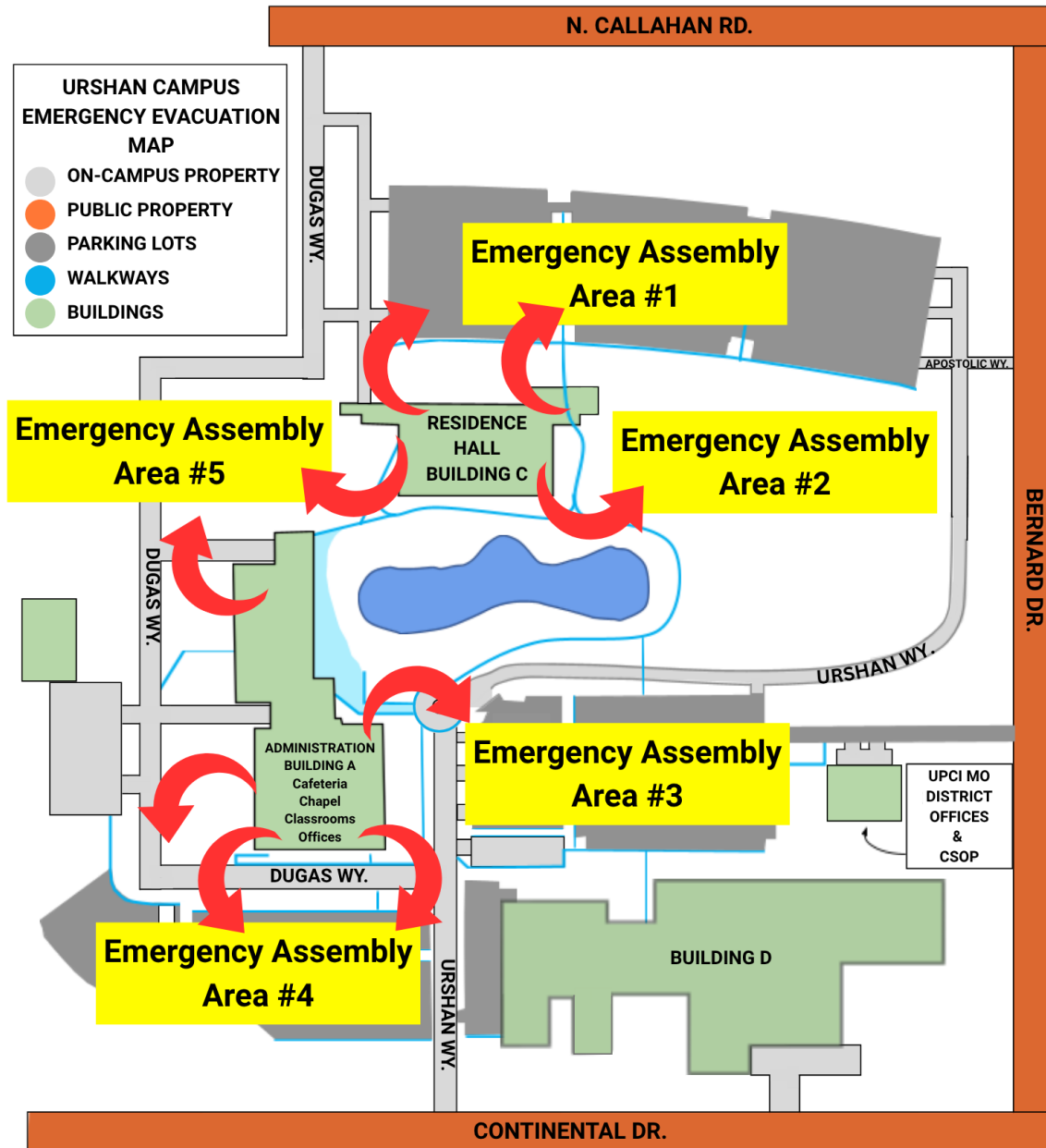
## General Evacuation Procedures

At the sound of a fire alarm or if you are instructed to evacuate, leave your current area immediately and proceed to the nearest exit, and leave the building. If you are the first to recognize a fire situation, activate the alarm, evacuate to a safe location using the nearest exit, and notify Campus Security at 720-975-6855 or dial 911.

### **During an emergency, or when the emergency alarm is activated:**

1. Remain Calm.
2. **DO NOT USE ELEVATORS.** Use the stairs.
3. Assist the physically impaired. If they are unable to exit without using an elevator, secure a safe location near a stairwell, and immediately inform Campus Security or first responders of their location.
4. Proceed to a clear area at least 150 feet from the building. Keep all walkways clear for emergency vehicles.
5. Make sure all personnel are out of the building.
6. Do not re-enter the building.
7. Missing or injured students or employees should be reported immediately, verbally or in writing, to Campus Security at 720-975-6855 or [security@urshan.edu](mailto:security@urshan.edu).

## Campus Emergency Evacuation Map



## Tornado Evacuation

A tornado warning is issued by national weather forecasting agencies to alert the public that severe thunderstorms with tornadoes are imminent or occurring. Warnings may be issued after a tornado or funnel has been observed by the public, storm chasers, emergency management, or law enforcement, or based on radar indications of tornado formation.

A tornado watch is issued when weather conditions are favorable for the development of severe thunderstorms capable of producing tornadoes. A tornado watch also serves as a severe thunderstorm watch. In preparation for severe weather emergencies, the Urshan community is strongly encouraged to familiarize themselves with the Emergency Evacuation Procedures.

Individuals with mobility impairments should immediately report to alternative shelter areas and avoid using elevators. Small, interior, and windowless rooms, such as restrooms or corridor areas, may be used. Avoid windows, parking ramps, catwalks, or pedestrian walkways.

The St. Charles County community warning sirens will be activated upon the issuance of a tornado warning. When the sirens sound, all students and employees are expected to evacuate to the nearest shelter locations. Faculty members are instructed to guide students to the appropriate shelter areas and take class role. Following the “All Clear” signal, University employees should report the names of any injured persons to Campus Security at 720-975-6855.

## **Shelter-in-Place Procedures – What it Means to “Shelter-in-Place”**

If an incident occurs and the buildings or areas around you 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 you to that danger. Thus, to “shelter-in-place” means to make a shelter of the building that you are in. With a few adjustments, this location can be made even safer and more comfortable until it is safe to go outside.

### **Basic “Shelter-in-Place” Guidance**

If an incident occurs and the building you are in is not damaged, stay inside in an interior room until you are told it is safe to exit. If your building is damaged, take your personal belongings (purse, wallet, access card, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit, and use the stairs instead of the elevators). Once you have evacuated, quickly seek shelter at the nearest campus building. If police or fire department personnel are on the scene, follow their directions.

### **How You Will Know to “Shelter-in-Place”**

A shelter-in-place notification may come from several sources including Campus Security, the Office of Student Services, Residence Life staff, other University employees, WPD, or other authorities using the institution’s emergency communications tools.

## How to “Shelter-in-Place”

No matter where you are, the basic steps of shelter-in-place will generally remain the same. Should the need arise, follow these steps, unless instructed otherwise by local emergency personnel:

1. If you are inside, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency. If you are outdoors, quickly proceed into the closest building or follow instructions from emergency personnel on the scene.
2. Locate a room to shelter inside. It should be:
  - an interior room;
  - at the lowest level; and
  - without windows or with the fewest number of windows. Several rooms may be necessary if a large number of people need shelter.
3. Shut and lock all windows (tighter seal). Close exterior doors.
4. Turn off air conditioners, heaters (including portable), and fans.
5. Close vents to ventilation systems as you are able. University staff will turn off the ventilation and central air as quickly as possible to affected buildings. If you are in your residence and have the ability to turn off your central air system, do so as quickly as possible.
6. Turn on or access a radio or TV broadcasts to monitor news reports and listen for further instructions.

Monthly tests of the Wentzville community emergency weather warning sirens are conducted by St. Charles County Emergency Management on the first Monday of every month at 9 a.m. These tests will not necessitate evacuation.

## INSTITUTIONAL POLICY STATEMENTS & RESOURCES

### Building Access & Physical Security

During normal business hours (8:00 AM – 5:00 PM, Monday through Friday, school year), administrative and academic buildings at UU and the UGST are open and accessible to students, staff, faculty, and visitors. After hours, on weekends, and during holidays, these buildings are locked to prevent unauthorized access.

Electronic access control has been installed across campus and at the off-campus residential hall, Building H. At the Durr Administration Building (A) students may access the main entrance with their keycards weekdays between 6:00 a.m. and 11:30 p.m. Weekend access may have shortened hours, which is determined by campus administrators. Employees have 24/7 access to the main entrance and two exterior second-floor entrances. Entrances are under video surveillance. UGST students have privileged access to the library, even outside regular library business hours; however,

their access is limited to the same hours as the Durr Administration Building, where the library is located. Students may use the Student Lounge until the building closes each night, unless otherwise directed by the Office of Student Services or Campus Security. All students and guests must leave Building A by 11:30 p.m.

Residence halls are locked 24 hours a day. Access is restricted to building residents and their authorized guests. Residents are encouraged to avoid allowing unknown individuals into the buildings. Residence Life staff and Campus Security monitor residential facilities and encourage building residents to report suspicious or unusual activity.

Campus Security personnel conduct nightly patrols of academic and administrative buildings. Security staff sweep each night, notifying students and guests when it is time to leave and ensuring that entrances are secured.

Remote camera systems are installed in common areas of academic, administrative, and residential facilities. These cameras record data to a secure server for investigative follow-up, are frequently monitored and may be specifically monitored as situations dictate and will be expanded in conjunction with future building renovations or security audits.

Access control is currently managed jointly by the IT Services Department and the Office of Student Services. Responsibility is in the process of being fully transitioned to the Student Services Department, which also oversees Residence Life.

## **Security of Campus**

Campus Security maintains 24/7 availability and conducts routine patrols by vehicle or on foot, monitoring academic, residential, and administrative facilities for safety and security-related matters.

In addition to daily operations, the department plans and manages security-related functions at large institutional events such as new student move-in, move-out, commencement, and other major campus activities. Officers also provide an enhanced security presence at Student Life events and other gatherings as needed.

Campus Security maintains a positive working relationship and open dialogue with local public safety officials, including the Wentzville Police and Fire Departments, as well as neighboring jurisdictions. These partnerships strengthen the University's ability to prepare for and respond to potential incidents while promoting a safe campus environment.

Campus Security officers are not sworn law enforcement personnel and therefore do not have the authority to make arrests.

## **Security Considerations Used in the Maintenance of Campus Facilities**

Urshan maintains campus facilities in a manner designed to minimize hazardous and unsafe conditions. Parking lots, walkways, and pathways are illuminated with appropriate lighting to enhance visibility and safety. Facilities and Maintenance, currently overseen by the Office of Student Services, promptly addresses issues such as burned-out lights, malfunctioning door locks, or other physical conditions that, if left unattended, could compromise security.

Members of the campus community play a vital role in enhancing safety by promptly reporting equipment or facility problems to Facilities/Maintenance Management for correction (Ticket creation: [maintenance@urshan.edu](mailto:maintenance@urshan.edu)).

With the creation of the Campus Security Department, routine physical security assessments are conducted across academic, administrative, and residential facilities. These assessments identify areas where additional measures may be required to improve safety. Campus Security works closely with the Office of Student Services to determine and implement strategies related to physical security systems, including access control, surveillance cameras, and other protective measures.

## **Security Awareness and Crime Prevention Programming**

All crime prevention and security awareness programs encourage students and employees to be responsible for their own security and the security of others. Participants in these programs are asked to be alert, security-conscious and involved and advised to call Campus Security or the Wentzville Police Department to report suspicious behavior.

## **Missing Persons**

All reports of missing persons are taken seriously and investigated fully until the individual is located. Any student missing for 24 hours or more (or sooner if circumstances warrant) must be reported immediately to Campus Security by calling 720-975-6855 and/or the WPD at 636-327-5105.

The investigation of missing persons is a coordinated effort between Campus Security, Student Services, and local law enforcement, using all available resources to determine the location and well-being of the missing person. Any employee who becomes aware of a missing student must immediately notify Campus Security.

If WPD or another law enforcement agency confirms that a student is missing, the student's name and identifying information will be entered into national law enforcement databases to alert other agencies and support recovery efforts.

## **Missing Student Policies**

If a student is determined to be missing, local law enforcement agencies, including but not limited to the WPD, will be notified within 24 hours, unless the determination of the missing status was originally made by law enforcement.

If the missing student is under 18 years of age and not emancipated, Urshan will notify the student's custodial parent or guardian within 24 hours. If the student is over 18, or emancipated, Urshan will notify the designated emergency contact on file. In either case, parents, guardians, or other contacts may also be reached to aid in determining the location of the missing student.

Campus Security will conduct a thorough investigation to help locate the missing student. This process may include interviewing friends, family members, instructors, Residence Life staff, and others connected to the student.

## **Alcohol and Drug Abuse Policy**

Urshan University maintains a drug and alcohol-free campus. The possession, use, or sale of alcohol and illegal drugs is prohibited on all University property and at University-sponsored events and is governed by federal and state law as well as the Urshan Alcohol and Drug Abuse Policy. The Wentzville Police Department is primarily responsible for the enforcement of state underage drinking laws and federal and state drug laws.

It is unlawful to possess, consume, sell, or furnish alcohol to anyone under 21. Missouri alcohol laws are enforced by the Missouri Division of Alcohol & Tobacco Control (ATC) and the WPD.

The possession, sale, manufacture, or distribution of controlled substances is illegal under both state and federal law. Enforcement is the responsibility of the WPD and other appropriate law enforcement agencies.

All students and employees must refrain from using tobacco in any form, consuming alcoholic beverages, using illegal drugs, or misusing prescription or over-the-counter drugs.

Students and employees are informed of this policy during orientation and are expected to comply through the University Code of Conduct. Violations of this policy will result in disciplinary action up to and including expulsion, termination of employment, and referral for criminal prosecution.

Students or employees seeking assistance for substance use may contact the Office of Student Services or the Center for Substance Abuse Treatment and Referral Hotline at 1-800-662-HELP (4357) for confidential support and referral

services.

## **Sexual Harassment Policy, Including VAWA Crimes<sup>3</sup>**

Urshan University and Urshan Graduate School of Theology (herein “Urshan” or “the institution”) is owned by the United Pentecostal Church International (UPCI), and it is expected that employees and students will conduct themselves in accordance with Christian principles and teachings, both on and off campus. Personal misconduct either on or off the campus by anyone connected with Urshan detracts from the Christian witness the institution strives to present to the world and hinders full accomplishment of the Urshan program. While at Urshan, students and employees are expected to obey federal, state, and local laws and are also expected to obey rules and regulations established by the institution. In all cases of violation of Urshan’s rules and regulations, or of actions in violation of local, state, or federal laws, the institution reserves the right to proceed with its own disciplinary action independently of governmental charges or prosecution. There is no Urshan policy to await the outcome of governmental prosecution.

Urshan values a learning community in which all members feel secure, physically, and intellectually, and prohibits all forms of sex discrimination. This includes having an environment free from Prohibited Conduct as defined by this policy, which includes acts of sexual harassment. Sexual harassment means acts of sexual assault, the offenses of interpersonal violence (which include domestic and dating violence), and sex-based stalking. Acts of retaliation are also prohibited. As an educational institution, Urshan affirms by this policy statement that acts of sex discrimination, including acts of sexual harassment, are detrimental to the integrity of the institution and will not be tolerated.

This policy supersedes any conflicting information contained in previous Title IX policies with respect to the definitions or procedures relating to conduct prohibited by this policy.

The Title IX policy document is publicly available at <https://urshan.edu/title-ix>.

### **Jurisdiction and Reporting**

This policy governs the conduct of University students (regardless of enrollment status), faculty, staff, and third parties, including vendors, alumni, and visitors. Third parties are both protected by and subject to this policy. They may report violations committed by University members and may face restrictions, including permanent exclusion from campus, for failing to comply.

This policy applies to conduct occurring:

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<sup>3</sup> This section was updated December 11, 2025, to reflect Urshan’s recently revised Title IX policy.

- On University property
- Off campus, when connected to University-sponsored programs or activities (e.g., travel, research, internships) or when the conduct creates a continuing adverse effect or hostile environment on campus.

Conduct via digital platforms, remote use of University-owned computing or email systems, or social media is considered on-campus conduct if it involves University resources. The University does not actively monitor online content but may respond to information brought to its attention if the conduct meets the definition of Prohibited Conduct. Free speech protections will be considered in all cases. Students and employees should consult the University's Network Policy - Revision 1.0.5 and Employee Handbook.

To be eligible for Title IX grievance procedures, a complaint must:

- Alleged Prohibited Conduct as defined in this policy
- Involve conduct that occurred in the United States
- Occur on property owned or controlled by the University
- Involve parties who are University students, employees, or individuals seeking access to the University's education program
- Relate to conduct where the University had substantial control over the Respondent and the context of the misconduct

Complaints outside the jurisdiction of this policy may be addressed through other institutional processes at the discretion of the Title IX Coordinator.

Individuals are encouraged to report suspected violations promptly. Reports may be submitted at any time, regardless of when the incident occurred. If the Respondent is no longer affiliated with the University, disciplinary options may be limited. However, supportive measures may still be offered, and actions may be taken to end, prevent, or address the conduct.

Urshan has designated a Title IX Coordinator who is responsible for the oversight of this policy and any procedures related to it. The Title IX Coordinator is responsible for overseeing and resolving all Title IX complaints and identifying and addressing any patterns or systemic concerns that arise during the review of such reports. The Coordinator's responsibilities include oversight of a prompt, fair, equitable investigation, and resolution process for reports of sexual harassment at Urshan. The Title IX Coordinator also evaluates trends on campus by using information reported to them and makes recommendations for campus wide training and education programs and other remedial actions designed to eliminate sex discrimination.

The Executive Vice President shall serve as the designee for the Title IX Coordinator in cases where there is a conflict of interest that would prohibit the Title IX Coordinator from providing fair and impartial oversight.

**How to Contact the Title IX Coordinator**

**Jereme Watson**  
**Director of Student Services**  
**Urshan University / Urshan Graduate School of Theology**  
**Durr Administrative Building, Room 418**  
**Office: (314) 838-8858, ext. 2123**  
**Email: title9@urshan.edu**

The U.S. Department of Education’s Office for Civil Rights (OCR) is responsible for overseeing institutional noncompliance with Title IX. To file a report directly with the U.S. Department of Education, use the contact information below.

The OCR office for Missouri is located at:	The OCR National Headquarters is located at:
<p><b>Kansas City Office</b>  <b>Office for Civil Rights</b>                  U.S. Department of Education                  One Petticoat Lane                  1010 Walnut Street, 3rd floor, Suite 320                  Kansas City, MO 64106</p> <p><b>Telephone:</b> 816-268-0550  <b>FAX:</b> 816-268-0599; TDD: 800-877-8339  <b>Email:</b> OCR.KansasCity@ed.gov</p>	<p><b>U.S. Department of Education</b>  <b>Office for Civil Rights</b>                  Lyndon B. Johnson Dept. of Education Bldg.                  400 Maryland Avenue, SW                  Washington, DC 20202-1100</p> <p><b>Telephone:</b> 1-800-421-3481  <b>FAX:</b> 202-453-6012; TDD: 800-877-8339  <b>Email:</b> OCR@ed.gov</p>

**Notice of Non-Discrimination & Notice of Coordination with Non-Discrimination Policy**

Urshan is committed to maintaining an environment free from harassment and discrimination for everyone and does not discriminate on the basis of race, sex, national origin, or other protected status. This policy prohibits specific forms of behavior that may violate Title IX of the Education Amendments of 1972 (“Title IX”); relevant provisions of the Violence Against Women Reauthorization Act of 2013 (“VAWA”); Title VII of the Civil Rights Act of 1964 (“Title VII”); the Jeanne Clery Campus Safety Act (“Clery Act”); and relevant state law.

**This policy and procedure apply only to acts of Prohibited Conduct as defined under this policy. Sex Discrimination or discrimination based on other protected statuses**

**that does not fall under the jurisdiction of this policy will be resolved using *Student Conduct & Responsibilities SS.01.010***

With that in mind, Urshan recognizes that it is important to coordinate this policy with other existing policies related to harassment and discrimination knowing that harassment related to an individual's sex can occur in conjunction with misconduct and harassment related to a person's race, color, national origin, religion, age, disability, or other protected status. Therefore, when a report is made of sexual harassment as well as harassment or discrimination based on some other protected status, Urshan's response will be governed by the procedures referenced in this policy in addition to other relevant policies in place at the institution. The status of the respondent will be used to determine which applicable policies attach. When a complaint alleges conduct by a student on employee or employee on student, more than one policy may be used to resolve the complaint.

Questions about which policy applies in a specific instance should be directed to the Title IX Coordinator or the Executive Vice President.

## **Definitions**

**Advisor:** The complainant and the respondent each have the right to have an advisor of their choice, at their expense, at any stage of the process and to be accompanied by that advisor at any meeting or hearing in which the complainant or the respondent is required to be present. An advisor is a person who provides advice, support, or counsel to a party and may only consult, support, and advise his or her advisee, but not speak for the advisee at any meeting nor may the advisor direct questions to any administrator, party, or witness in the investigative stage. Should the advisor become disruptive during any meeting, the Title IX Coordinator or investigator may ask them to leave. For purposes of the live hearing, if a party does not have an advisor at the time when the Title IX Coordinator issues notice of the availability of the final investigative report, Urshan will appoint an advisor to the party. When Urshan appoints an advisor, the role of that advisor is limited to asking the questions a party wants asked in the live hearing, i.e., for the purposes of cross examination. Urshan will not charge a fee when they appoint an advisor.

**Complainant:** "Complainant" means an individual who is alleged to be the victim of conduct that could constitute Prohibited Conduct.

**Respondent:** "Respondent" means an individual who has been reported to be the perpetrator of conduct that could constitute Prohibited Conduct.

**Party:** "Party" means either the complainant(s) or respondent(s) in an investigation or action relating to a report of Prohibited Conduct. "Parties" refers to the complainant and respondent collectively.

**Investigator:** The “Investigator” is the person assigned to conduct the investigation upon the signing of a complaint and a request for a formal resolution process. The Investigator may be a Title IX Coordinator, an employee, or a contracted service provider.

**Decision Maker:** The “decision-maker” is the person who will make the determination of responsibility for emergency removal and after a formal resolution process or following an appeal. The decision-maker will provide the determination in writing and cannot be the same person as the Title IX Coordinator or the investigator on a case arising out of the same facts or circumstances. In the case of an appeal, the decision-maker will be different from the person(s) who made the initial determination. The decision-maker may be an employee or a contracted service provider. The University retains the right to establish a pool of cross-trained individuals who may serve as an investigator or one of the decision-makers; however, they would never hold more than one position during a particular complaint.

## **Prohibited Conduct Defined by Urshan**

**Prohibited Conduct** is a broad term used by Urshan to identify a number of forms of harassment based on sex. Prohibited Conduct includes the following specifically defined forms of behavior: Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking (regardless of if the stalking occurs in the context of an intimate relationship.). Retaliation is also prohibited under this policy and resolution procedure but will not be resolved using the procedures found in this policy. Complaints of retaliation will be resolved using the procedures found in the Student Code of Conduct or the Employee Handbook.

### **A. Sexual Harassment**

“Harassment” is conduct that creates an intimidating, offensive, or hostile working or living/learning environment or that unreasonably interferes with work or access to their educational program based on a person’s protected status, including sex. All such conduct is unlawful.

“Sexual Harassment” is any unwelcome sexual advance, request for sexual favors, or other unwelcome conduct of a sexual nature, whether verbal, physical, graphic, or otherwise.

**Quid Pro Quo Harassment:** An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual’s participation in unwelcome sexual conduct.

**Hostile Environment:** Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the recipient’s education program or activity.

Such conduct includes unwelcome conduct of a sexual nature and may include unwelcome conduct based on sex or sex stereotyping.

In evaluating whether the unwelcome conduct is so severe, pervasive, and objectively offensive that it effectively denies a person equal access, the University uses a reasonable person standard that takes into account the totality of known circumstances in a particular situation, including but not limited to:

- The frequency, nature, and severity of the conduct.
- The age, disability status, and other characteristics of the parties.
- Whether the conduct was physically threatening.
- The effect of the conduct on the Complainant's mental or emotional state.
- Whether the conduct was directed at more than one person.
- Whether the conduct arose in the context of other discriminatory conduct.
- Whether the conduct unreasonably interfered with the Complainant's educational or work performance and/or University programs or activities.

The term "effectively denies" does not require a Complainant to be entirely, physically excluded from educational opportunities and may also be established when the conduct so undermines and detracts from the Complainant's work or school access so that such access is effectively denied.

This Policy is consistent with Urshan's commitment to academic freedom and free speech. This commitment requires that Urshan protect community members' expression of ideas in their teaching and learning including topics that may be controversial, provocative, or unpopular. This protection extends to the expression of ideas, however controversial, in the classroom, and other campus-related activities. It must be recognized, however, that this protection has its limits. This Policy defines those limits and conduct which is found to be "harassing" is not consistent with Urshan's commitment to academic freedom and free speech. No member of Urshan community may escape responsibility for engaging in harassing conduct merely by labeling the conduct as "speech" or other expressive activity.

**B. Sexual Assault Forms and VAWA Crimes defined in the following section.**

**C. Retaliation**

Retaliation means any adverse action taken against a person for making a good faith report of Prohibited Conduct or participating in any proceeding under this policy. Retaliation includes threatening, intimidating, harassing, coercing, or any other conduct that would discourage a reasonable person from engaging in activity protected under this policy. Retaliation may be present even where there is a finding of "no responsibility" on the allegations of Prohibited Conduct. Retaliation does not include good faith complaints filed with the institution.

## Missouri Definitions of VAWA-Related Crimes

**Domestic Violence:** Missouri's protective order statutes provide the following definitions (Mo. Rev. Stat. § 455.010):

"Domestic violence" is abuse or stalking committed by a family or household member. "Family" or "household member", [includes] spouses, former spouses, any person related by blood or marriage, persons who are presently residing together or have resided together in the past, any person who is or has been in a continuing social relationship of a romantic or intimate nature with the victim, and anyone who has a child in common regardless of whether they have been married or have resided together at any time.

### **Missouri's criminal statutes outline various degrees of domestic assault:**

1. First Degree (Mo. Rev. Stat. § 565.072): A person commits the offense of domestic assault in the first degree if he or she attempts to kill or knowingly causes or attempts to cause serious physical injury to a domestic victim, as the term "domestic victim" is defined under section 565.002. Mo Rev. Stat. § 565.002(6) indicates that a "domestic victim" is a household or family member as the term "family" or "household member" is defined in 455.010, including any child who is a member of the household or family.
2. Second Degree (Mo. Rev. Stat. § 565.073): A person commits the offense of domestic assault in the second degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and he or she: (1) Knowingly causes physical injury to such domestic victim by any means, including but not limited to, use of a deadly weapon or dangerous instrument, or by choking or strangulation; or (2) Recklessly causes serious physical injury to such domestic victim; or (3) Recklessly causes physical injury to such domestic victim by means of any deadly weapon.
3. Third Degree (Mo. Rev. Stat. § 565.074): A person commits the offense of domestic assault in the third degree if he or she attempts to cause physical injury or knowingly causes physical pain or illness to a domestic victim, as the term "domestic victim" is defined under section 565.002.
4. Fourth Degree (Mo. Rev. Stat. § 565.076): A person commits the offense of domestic assault in the fourth degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and: (1) The person attempts to cause or recklessly causes physical injury, physical pain, or illness to such domestic victim; (2) With criminal negligence the person causes physical injury to such domestic victim by means of a deadly weapon or dangerous instrument; (3) The person purposely places such domestic victim in apprehension of immediate physical injury by any means; (4) The person recklessly engages in conduct which creates a substantial risk of death or

serious physical injury to such domestic victim; (5) The person knowingly causes physical contact with such domestic victim knowing he or she will regard the contact as offensive; or (6) The person knowingly attempts to cause or causes the isolation of such domestic victim by unreasonably and substantially restricting or limiting his or her access to other persons, telecommunication devices or transportation for the purpose of isolation.

**Dating Violence:** The institution has determined, based on good-faith research, that Missouri law does not define the term dating violence.

**Sexual Assault:** The institution has determined, based on good-faith research, that Missouri's criminal statutes do not define the term sexual assault. However, Missouri's protective order statutes define "sexual assault" as causing or attempting to cause another to engage involuntarily in any sexual act by force threat of force, duress, or without that person's consent. (Mo. Rev. Stat. § 455.010(1)(e)).

For purposes of the Clery Act, the term "sexual assault" includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Missouri law are as follows:

- **Rape in the First Degree** (Mo. Rev. Stat. § 566.030.1): A person commits the offense of rape in the first degree if he or she has sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.
- **Rape in the Second Degree** (Mo. Rev. Stat. § 566.030.1): A person commits the offense of rape in the second degree if he or she has sexual intercourse with another person knowing that he or she does so without that person's consent.
- **Fondling:** The institution has determined, based on good-faith research, that Missouri law does not define the term fondling.
- **Incest** (Mo. Rev. Stat. § 568.020.1): A person commits the offense of incest if he or she marries or purports to marry or engages in sexual intercourse or deviate sexual intercourse with a person he or she knows to be, without regard to legitimacy, his or her: (1) Ancestor or descendant by blood or adoption; or (2) Stepchild, while the marriage creating that relationship exists; or (3) Brother or sister of the whole or half-blood; or (4) Uncle, aunt, nephew or niece of the whole blood.

- **Statutory Rape, First Degree** (Mo. Rev. Stat. § 566.032.1): A person commits the offense of statutory rape in the first degree if he or she has sexual intercourse with another person who is less than fourteen years of age.
- **Statutory Rape, Second Degree** (Mo. Rev. Stat. § 566.034.1): A person commits the offense of statutory rape in the second degree if being twenty-one years of age or older, he or she has sexual intercourse with another person who is less than seventeen years of age.
- Other crimes under Missouri law that may be classified as a “sexual assault” include the following:
  - **Sodomy in the First Degree** (Mo. Rev. Stat. § 566.060.1): A person commits the offense of sodomy in the first degree if he or she has deviate sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.
  - **Sodomy in the Second Degree** (Mo. Rev. Stat. § 566.061.1): A person commits the offense of sodomy in the second degree if he or she has deviated sexual intercourse with another person knowing that he or she does so without that person's consent.
  - **Statutory Sodomy, First Degree** (Mo. Rev. Stat. § 566.062.1): A person commits the offense of statutory sodomy in the first degree if he or she has deviate sexual intercourse with another person who is less than fourteen years of age.
  - **Statutory Sodomy, Second Degree** (Mo. Rev. Stat. § 566.064.1): A person commits the offense of statutory sodomy in the second degree if being twenty-one years of age or older, he or she has deviate sexual intercourse with another person who is less than seventeen years of age.
  - **Child Molestation, First Degree** (Mo. Rev. Stat. § 566.067.1): A person commits the offense of child molestation in the first degree if he or she subjects another person who is less than fourteen years of age to sexual contact and the offense is an aggravated sexual offense.
  - **Child Molestation, Second Degree** (Mo. Rev. Stat. § 566.068.1): A person commits the offense of child molestation in the second degree if he or she: (1) Subjects a child who is less than twelve years of age to sexual

contact; or (2) Being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact and the offense is an aggravated sexual offense.

- Child Molestation, Third Degree (Mo. Rev. Stat. § 566.069.1): A person commits the offense of child molestation in the third degree if he or she subjects a child who is less than fourteen years of age to sexual contact.
- Child Molestation, Fourth Degree (Mo. Rev. Stat. § 566.071.1): A person commits the offense of child molestation in the fourth degree if, being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact.
- Sexual Misconduct Involving a Child (Mo. Rev. Stat. § 566.083.1): A person commits the offense of sexual misconduct involving a child if such person: (1) Knowingly exposes his or her genitals to a child less than fifteen years of age under circumstances in which he or she knows that his or her conduct is likely to cause affront or alarm to the child; (2) Knowingly exposes his or her genitals to a child less than fifteen years of age for the purpose of arousing or gratifying the sexual desire of any person, including the child; (3) Knowingly coerces or induces a child less than fifteen years of age to expose the child's genitals for the purpose of arousing or gratifying the sexual desire of any person, including the child; or (4) Knowingly coerces or induces a child who is known by such person to be less than fifteen years of age to expose the breasts of a female child through the internet or other electronic means for the purpose of arousing or gratifying the sexual desire of any person, including the child.
- Sexual Misconduct, First Degree (Mo. Rev. Stat. § 566.093.1): A person commits the offense of sexual misconduct in the first degree if such person: (1) Exposes his or her genitals under circumstances in which he or she knows that his or her conduct is likely to cause affront or alarm; (2) Has sexual contact in the presence of a third person or persons under circumstances in which he or she knows that such conduct is likely to cause affront or alarm; or (3) Has sexual intercourse or deviate sexual intercourse in a public place in the presence of a third person.
- Second Degree Sexual Misconduct (Mo. Rev. Stat. § 566.095.1): A person commits the offense of sexual misconduct in the second degree if he or she solicits or requests another person to engage in sexual conduct under circumstances in which he or she knows that such request or solicitation is likely to cause affront or alarm.

- Sexual Abuse in the First Degree (Mo. Rev. Stat. § 566.100.1): A person commits the offense of sexual abuse in the first degree if he or she subjects another person to sexual contact when that person is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion.
- Sexual Abuse, Second Degree (Mo. Rev. Stat. § 566.101.1): A person commits the offense of sexual abuse in the second degree if he or she purposely subjects another person to sexual contact without that person's consent.

**Stalking:** Missouri law defines stalking as a course of conduct that harasses or follows another person with the intent to disturb or cause fear (Mo. Rev. Stat. § 565.225). There are two degrees of stalking:

1. First Degree (Mo. Rev. Stat. § 565.225): A person commits the offense of stalking in the first degree if he or she purposely, through his or her course of conduct, disturbs or follows with the intent of disturbing another person and: (1) Makes a threat communicated with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety, the safety of his or her family or household member, or the safety of domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property. The threat shall be against the life of, or a threat to cause physical injury to, or the kidnapping of the person, the person's family or household members, or the person's domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property; or (2) At least one of the acts constituting the course of conduct is in violation of an order of protection and the person has received actual notice of such order; or (3) At least one of the actions constituting the course of conduct is in violation of a condition of probation, parole, pretrial release, or release on bond pending appeal; or (4) At any time during the course of conduct, the other person is seventeen years of age or younger and the person disturbing the other person is twenty-one years of age or older; or (5) He or she has previously been found guilty of domestic assault, violation of an order of protection, or any other crime where the other person was the victim; or (6) At any time during the course of conduct, the other person is a participant of the address confidentiality program under sections 589.660 to 589.681, and the person disturbing the other person knowingly accesses or attempts to access the address of the other person.
2. Second Degree (Mo. Rev. Stat. § 565.227.1): A person commits the offense of stalking in the second degree if he or she purposely, through his or her course of conduct, disturbs, or follows with the intent to disturb another person.

As used in the definitions of stalking above, the term "disturbs" shall mean to engage in a course of conduct directed at a specific person that serves no legitimate purpose and that would cause a reasonable person under the circumstances to be frightened, intimidated, or emotionally distressed.

**Consent:** Consent (as it relates to sexual activity) (Mo. Rev. Stat. § 556.061(14)): Consent or lack of consent may be expressed or implied. Assent does not constitute consent if: (a) It is given by a person who lacks the mental capacity to authorize the conduct charged to constitute the offense and such mental incapacity is manifest or known to the actor; or (b) It is given by a person who by reason of youth, mental disease or defect, intoxication, a drug-induced state, or any other reason 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 (c) It is induced by force, duress or deception.

### **Definitions of Additional Key Terms**

***The inclusion of these terms, and their subsequent definitions, is not an endorsement by Urshan of any type of sexual activity outside Biblical marriage as defined in the UPCI's Articles of Faith and Position Papers. The institution is required by law to present the legal definitions for these terms within this policy to ensure federal compliance and mutual understanding for all members of the Urshan Community.***

To provide clarity to all individuals as to the kinds of behavior which constitute Prohibited Conduct in a legal context, Urshan further defines key terms below which the institution will use in evaluating whether Prohibited Conduct has occurred.

### **Affirmative Consent as Defined by Urshan**

While Urshan in no way condones sexual activity outside of marriage or between anyone other than husband and wife, "Affirmative Consent" means affirmative, conscious, and voluntary agreement to engage in sexual activity. Affirmative consent is required for any sexual activity to occur between individuals. It is the responsibility of each person involved in the sexual activity to ensure that the person has the affirmative consent of the other to engage in the sexual activity.

It shall not be a valid excuse to alleged lack of affirmative consent that the Respondent believed that the Complainant consented to the sexual activity under either of the following circumstances: (a) The Respondent's belief in affirmative consent arose from the intoxication or recklessness of the Respondent, or (b) the Respondent did not take reasonable steps, in the circumstances known to the Respondent at the time, to ascertain whether the Complainant affirmatively consented.

The following are essential elements of affirmative consent:

- *Informed and reciprocal*: All parties must demonstrate a clear and mutual understanding of the nature and scope of the act to which they are consenting and a willingness to do the same thing, at the same time, in the same way.
- *Freely and actively given*: Consent cannot be obtained through the use of force, coercion, threats, intimidation or pressure, or by taking advantage of the incapacitation of another individual.
- *Mutually understandable*: Communication regarding consent consists of mutually understandable words and/or actions that indicate a mutually unambiguous willingness to engage in sexual activity. Consent may not be inferred from silence, passivity, lack of resistance, previous participation, or lack of active response. An individual who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. **Relying solely upon nonverbal communication can lead to a false conclusion as to whether consent was sought or given.**
- *Not indefinite*: Affirmative consent must be ongoing throughout the activity. **Consent may be withdrawn by any party at any time.** Recognizing the dynamic nature of sexual activity, individuals choosing to engage in sexual activity must evaluate consent in an ongoing manner and communicate clearly throughout all stages of sexual activity. Withdrawal of consent can be an expressed “no” or can be based on an outward demonstration that conveys that an individual is hesitant, confused, uncertain, or is no longer a mutual participant. Once consent is withdrawn, the sexual activity must cease immediately, which means they must separate their bodies, and all parties must obtain mutually expressed or clearly stated consent before continuing further sexual activity.
- *Not unlimited*: Consent to one form of sexual contact does not constitute consent to all forms of sexual contact, nor does consent to sexual activity with one person constitute consent to activity with any other person. Each participant in a sexual encounter must consent to each form of sexual contact with each participant. Even in the context of a current or previous intimate relationship, each party must consent to each instance of sexual contact each time. The consent must be based on mutually understandable communication that clearly indicates a willingness to engage in sexual activity. The mere fact that there has been prior intimacy or sexual activity does not, by itself, imply consent to future acts.
- *Age*: The State of Missouri considers sexual intercourse with a person under the age of 17 to be unlawful. A person who engages in “unlawful” sexual intercourse as described in Missouri state law does so without affirmative consent as defined by Urshan’s Policy. Reports received that allege sexual

contact with a person under the age of 17 will be reported to the City of Wentzville (MO) Police Department (or appropriate law enforcement agency if the act occurred outside of Wentzville) as this conduct could constitute sexual abuse of children.

### **Force**

“Force” is the use or threat of physical violence to overcome an individual’s freedom to choose whether to participate in sexual activity or provide consent. Consent obtained by force is not valid.

For the use of force to be demonstrated, there is no requirement that a Complainant resist the sexual advance or request. However, evidence of resistance by the Complainant will be viewed as a clear demonstration of a lack of consent.

### **Intimidation**

“Intimidation” is the use of implied threats to overcome an individual’s freedom to choose whether to participate in sexual activity or provide consent. Consent obtained by intimidation is not valid.

### **Coercion**

“Coercion” is the use of pressure to compel another individual to initiate or continue sexual activity against that individual’s will. Consent obtained through coercion is not valid. Coercion can include a wide range of behaviors, including unwanted pressure, intimidation, manipulation, threats, and extortion. A person’s words or conduct are sufficient to constitute coercion if they wrongfully impair another individual’s freedom of will and ability to choose whether to engage in sexual activity.

Examples of coercion include continuously pressuring someone (“wearing them down” to engage in sexual activity) or threatening to harm oneself if the other party does not engage in the sexual activity. When someone indicates, verbally or physically, that they do not want to engage in a particular sexual activity, that they want to stop a particular activity, or that they do not want to go past a certain point of sexual interaction, continued activity or pressure to continue beyond that point can be coercive. Urshan will evaluate the following in determining whether or not coercion was used: (a) the frequency of the application of pressure, (b) the intensity of the pressure, (c) the degree of isolation of the person being pressured, and (4) the duration of the pressure.

### **Incapacitation**

“Incapacitation” is a state where an individual cannot make an informed and rational decision to engage in sexual activity because of a lack of conscious understanding of the fact, nature, or extent of the act (e.g., to understand the who, what, when, where, why, or how of the sexual interaction) and/or is physically helpless. For example, an individual is incapacitated, and therefore unable to give consent, if the individual is asleep, unconscious, or otherwise unaware that sexual activity is occurring. An

individual will also be considered incapacitated if the person cannot understand the nature of the activity or communicate due to a mental or physical condition, even if temporary.

Incapacitation may result from the use of alcohol, drugs, or other medication. Consumption of alcohol or other drugs alone is insufficient to establish incapacitation.

The impact of alcohol and drugs varies from person to person, and evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs impacts an individual's: (1) decision-making ability; (2) awareness of consequences; (3) ability to make informed judgments; or (4) capacity to appreciate the nature and the quality of the act.

**While Urshan does not condone the use of alcohol or drugs**, if the Complainant was under the effects of such substances at the time of an alleged assault, Urshan has the right to provide amnesty for purposes of this policy to the Complainant, as well as any witnesses, to ensure that the offense can be properly investigated.

It shall not be a valid excuse that the Respondent believed that the Complainant affirmatively consented to the sexual activity if the Respondent knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances: (a) the Complainant was asleep or unconscious; (b) the Complainant was incapacitated due to the influence of drugs, alcohol, or medication, so that the Complainant could not understand the fact, nature, or extent of the sexual activity; (c) the Complainant was unable to communicate due to a mental or physical condition.

Whether the Respondent reasonably should have known that the Complainant was incapacitated will be evaluated using an objective reasonable person standard. The fact that the Respondent was actually unaware of the Complainant's incapacity is irrelevant to this analysis, particularly where the Respondent's failure to appreciate the Complainant's incapacitation resulted from the Respondent's failure to take reasonable steps to determine the Complainant's incapacitation or where the Respondent's own capacity (from alcohol or drugs) caused the Respondent to misjudge the Complainant's incapacity.

### **Consensual Relationships**

***Sexual or romantic relationships between employees and students with whom they instruct, supervise, evaluate, or advise are strongly prohibited and against the values of the Urshan system.***

### **Privacy and Confidentiality**

Urshan is committed to protecting the privacy of all individuals involved in the investigation and resolution of a report under this policy. Urshan is also committed to

assisting students, employees, and third parties to make informed choices. With respect to any report under this policy, the institution will make reasonable efforts to protect the privacy of participants, in accordance with applicable state and federal law, while balancing the need to gather information to assess the report and to take steps to eliminate Prohibited Conduct.

**Privacy and Confidentiality have distinct meanings under this policy.**

**Privacy:** Privacy means that information related to a report of Prohibited Conduct will be shared with a limited circle of Urshan employees who “need to know” to assist in the assessment, investigation, and resolution of the report. All Employees who participate in Urshan’s response to reports of Prohibited Conduct receive specific training and guidance about sharing and safeguarding private information in accordance with state and federal law.

Further, the institution will maintain as private, any accommodations or protective measures provided to the parties to the extent that maintaining such confidentiality would not impair Urshan’s ability to provide the accommodations or protective measures. The privacy of student educational records will be protected in accordance with the Family Educational Rights and Privacy Act (“FERPA”).<sup>4</sup> All documentation related to a student’s report, investigation, and resolution are protected by FERPA and will not be released, except as required by law. Non-identifying information about a report may be shared with certain Urshan officials to comply with the Clery Act. A complainant’s name will never be published in connection with the institution’s obligations under the Clery Act. In addition, the Urshan institution does not publish identifiable information regarding victims in Urshan’s Daily Crime Log or online. Any person, including a victim of Prohibited Conduct, may request that her or his directory information on file be removed from public sources. Complainants may request that directory information on file be removed from public sources by contacting the Title IX Coordinator at (314) 848-8858, ext. 2123 or by calling the Registrar at (314) 848-8858, ext. 3000.

The privacy of an individual’s medical and related records generally is protected by the Health Insurance Portability and Accountability Act (“HIPAA”), excepting health records protected by FERPA and by Missouri state statutes. Access to an employee’s personnel records may be restricted in accordance with applicable Missouri law.

**Confidentiality:** Confidentiality exists in the context of laws that protect certain relationships, including with medical and clinical care providers (and those who provide administrative services related to the provision of medical and clinical care), mental health providers, counselors, and licensed and/or credentials pastors acting in that capacity, all of whom may engage in confidential communications under Missouri law.

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<sup>4</sup> The Family Educational Rights and Privacy Act, 20 U.S.C. Section 1232g; 34 C.F.R. Part 99.

When information is shared by an individual with a community professional with the same legal protections, the Confidential Employee (and/or such community professional) cannot reveal the information to any third party except when an applicable law or a court order requires or permits disclosure of such information. For example, information may be disclosed when: (i) the individual gives written consent for its disclosure; (ii) there is a concern that the individual will likely cause serious physical harm to self or others; (iii) the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18; and/or (iv) the employee is identified as a Campus Security Authority under the Clery Act, in which case they would need to report non-identifying aggregate data about the incident to the reporting structure of the institution.

### **Employee Title IX Reporting Responsibilities**

Every faculty, staff, and volunteer on campus who has been identified as a responsible employee must immediately report to the Title IX Coordinator any Prohibited Conduct reported to them or observed by them, including the name of the complainant and respondent, if known. Urshan requires everyone in the campus community, including Confidential employees, to report the suspected abuse of children (those under the age of 18).

Public awareness events such as candlelight vigils, protests, “survivor speak outs,” or other forums in which students, staff, or faculty members disclose incidents of Prohibited Conduct, are not considered a report for purposes of triggering Urshan’s obligation to investigate any particular incident(s). Such events may, however, inform the need for campus-wide education and prevention efforts, and Urshan will provide information about Title IX and Clery (VAWA) rights at these events. Similarly, information disclosed during a student’s participation as a subject in an Institutional Review Board-approved human subjects research protocol (“IRB Research”) is not considered a report of Prohibited Conduct for purposes of triggering the institution’s obligation to investigate any particular incident(s).

### **Request for Anonymity by a Complainant**

Where the complainant requests that their identity not be shared with the respondent or that Urshan not pursue an investigation, the institution must balance this request with Urshan’s responsibility to provide a safe and non-discriminatory environment for all Urshan community members. Urshan, through the Title IX Coordinator, will take all reasonable steps to investigate and respond to the complaint consistent with the request not to share identifying information or pursue an investigation, but its ability to do so may be limited by the request. Under these circumstances, the complainant’s request will be balanced against the following factors:

- The seriousness of the conduct;
- The respective ages and roles of the complainant and respondent;

- Whether there have been other reports of Prohibited Conduct under this policy involving the respondent;
- Whether the circumstances suggest there is a risk of the respondent committing additional acts of Prohibited Conduct;
- Whether the respondent has a record indicating a history of violence;
- Whether the report indicates the respondent threatened further sexual violence or other violence against the complainant and/or other individuals involved;
- Whether the reported conduct was committed by multiple individuals;
- Whether the circumstances suggest there is a risk of future acts of Prohibited Conduct under similar circumstances;
- Whether the reported conduct was perpetrated with a weapon; and/or
- Whether Urshan possesses other means to obtain relevant evidence (e.g., security cameras or personnel, physical evidence).

Where Urshan is unable to act consistently with the request of the complainant, the Title IX Coordinator will inform the complainant about the chosen course of action, which may include Urshan’s Title IX Coordinator signing the formal complaint and proceeding through the formal grievance process. In this case, the complainant still remains the complainant with all rights, including the right to participate or not participate, as well as all notice documents that would normally be provided to a complainant. i.e., the complainant retains standing. initiating the grievance process.

### **Law Enforcement Options**

Complainants may simultaneously pursue criminal and Urshan disciplinary action. Urshan will support complainants in understanding and assessing their reporting options. Upon receipt of a report, Urshan will inform individuals of their right to file (or decline to file) a criminal report as well as the availability of medical, counseling and support services, and additional interim measures to prevent contact between a complainant and a respondent, such as housing, academic, transportation and working accommodations, if reasonably available (see Supportive Measures). Making a report to Urshan does not require participation in any subsequent proceedings, nor is a report required for a complainant to receive support or remedial measures.

Although the Urshan institution strongly encourages all members of its community to report violations of this policy to law enforcement, it is the complainant’s choice whether to make such a report and victims have the right to decline involvement with the police.<sup>5</sup> Urshan’s Title IX Coordinator will assist any victim with notifying local police if they desire.

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<sup>5</sup> The Title IX Coordinator is a “Responsible Employee” under Title IX and also a “Campus Security Authority” under the Clery Act. Statistical information not including the victim’s identifying information will be provided to an Urshan official responsible for compiling Urshan’s crime statistics for the annual security report, even if the victim chooses not to report to others.

If the complainant would like to contact local law enforcement authorities, either of the following processes may be used:

- A complainant may choose NOT to have law enforcement contacted and no report filed BUT still may have an evidence kit collected. (Note: The complainant later may file a report and may pursue criminal charges.) (Important: Police will be called to the hospital when a sexual assault is reported. The party does not have to speak to them and may still have evidence collected from his or her body.)
- A complainant may file a police report and ask that the investigation and charges be pursued immediately. While the prosecuting attorney is still the decision-maker in whether the perpetrator is charged criminally, the complainant can cooperate and provide as much timely cooperation and information as may be possible.

Parties should be aware that a statute of limitations may apply to certain crimes in Missouri that may impact a criminal investigation separate from any institutional process. The Wentzville Police Department may be reached directly by calling 911, 636-327-5105, or in person at 1019 Schroeder Creek Blvd. Wentzville, MO. Additional information about the WPD may be found online at:

<https://www.wentzvillemo.gov/police/>

### **Reporting Timeframes**

Urshan encourages prompt reporting of Prohibited Conduct so that Urshan can respond promptly and equitably; however, the institution does not limit the timeframe for reporting. If the respondent is no longer affiliated with Urshan at the time the report is made, the institution will provide supportive measures, assist the complainant in identifying external reporting options, and take other reasonable steps to respond under Title IX.

### **Immediate Steps Victims Should Take After Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

After an incident of sexual assault or intimate partner violence involving physical force, the victim should consider seeking medical attention as soon as possible. Victims who agree to have forensic evidence collection conducted as part of their care can locate hospitals with such emergency rooms in the Resources section of this policy or by calling the City of Wentzville Police Department. SSM Health – St. Joseph Hospital, Wentzville, and SSM Health – St. Joseph Hospital, Lake Saint Louis can complete forensic evidence recovery and preserve evidence in case the complainant decides to file a police report.

It is important that a victim of sexual assault or physical violence from a dating violence or domestic violence incident not bathe, douche, smoke, change clothes or clean the bed/linen/area where the victim was assaulted if the offense occurred within the past 120 hours, so that evidence may be preserved.

In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of all forms of Prohibited Conduct are also encouraged to preserve evidence including saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs, or other copies of documents, if they have any that may be useful to the institutional investigators or law enforcement.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult.

If a victim chooses not to make a complaint regarding an incident, he or she nevertheless should consider speaking with the Title IX Coordinator or other law enforcement to preserve evidence if she or he changes her/his mind later.

### **Protection Orders and No-Contact Orders**

An order of protection is an order issued by a Missouri court pursuant to the Domestic Violence Act that restrains a person from abusing, stalking, sexually assaulting, or harassing another person. Unlike a restraining order, an order of protection carries criminal penalties for violation. An order of protection is valid in every state and should be upheld by law enforcement in every state. There are two types of orders of protection in the State of Missouri: an ex parte order of protection and a full order of protection. An ex parte order of protection is issued by the court before the person against whom the order is directed has received notice of the petition or an opportunity to be heard in court. It is a temporary order. A full order of protection is issued after a hearing on the record when the person against whom the order is directed has received notice of the proceedings and has had an opportunity to be heard.

The petition must be filed in the county where the petitioner resides, where the alleged incident of domestic violence, stalking, or sexual assault occurred or where the respondent may be served.

The circuit clerk's office will provide copies of the forms necessary for the presentation of the petition to the court. Clerks will aid in completing these forms without cost. The location of the office where a petition can be filed will be posted conspicuously in the court building. No filing fees, court costs, or bond will be assessed to the petitioner in a domestic violence/stalking/sexual assault action. An attorney is not needed to obtain an order of protection. Forms also can be found at [www.courts.mo.gov](http://www.courts.mo.gov) by selecting Court Forms > Adult Abuse Forms.

The closest circuit court to campus is the St. Charles County Circuit Court. They are

located in the Eleventh Judicial Circuit Court, 300 North 2nd Street, St Charles, MO, Main Number **636-949-3080**, Business Hours 8:00 a.m. to 5:00 p.m.

The institution may issue an institutional no contact order if deemed appropriate or at the request of the victim or accused. If Urshan receives a report that such an institutional no contact order has been violated, the Institution will initiate disciplinary proceedings appropriate to the status of the accused (student, employee, etc.) and will impose sanctions if the accused is found responsible for violating the no contact order.

### **Accommodations, Protective, and Supportive Measures Available for Victims**

Under Title IX, supportive measures are non-disciplinary, non-punitive services offered to individuals involved in a report of sex discrimination or harassment. These measures are designed to restore or preserve equal access to education without unreasonably burdening either party. Supportive measures must be available to both the complainant and the respondent, and measures must be customized to the specific needs of the individuals involved. Parties have the right to decline participation in a grievance process while still receiving supportive measures and are free of charge.

Supportive measures aim to:

- Ensure safety and well-being
- Prevent further harassment or retaliation
- Maintain access to educational programs and activities

They can be implemented before, during, or after a formal complaint, and even if no formal complaint is filed.

### **Examples of Supportive Measures Under Title IX**

- Extensions of deadlines
- Adjustments to class schedules
- Changes in classroom seating or assignments
- Increased campus security or monitoring
- Campus escort services
- Mutual no-contact orders
- Changes in housing assignments (e.g., different room or floor)
- Changes in work schedules or locations
- Professional counseling service
- Victim advocacy and confidential support
- Modifications to participation in clubs, sports, or other activities
- Adjustments to shared spaces or group projects
- Leave options
- Temporary leaves of absence for medical or emotional recovery

## Reporting Procedures for Sexual Harassment and VAWA-Related Crimes

If you have been the victim of domestic violence, dating violence, sexual assault or harassment, or stalking, you should report the incident promptly to the Title IX Coordinator by calling, writing, or coming into the office to report in person. Reports of all domestic violence, dating violence, sexual assault and stalking made to Campus Security will automatically be referred to the Title IX Coordinator for investigation regardless of if the complainant chooses to pursue criminal charges.

### Students and Employees should report to:

**Jereme Watson**  
**Director of Student Services & Title IX Coordinator**  
**Durr Administration Building, Room 418**  
**Office: (314) 838-8858 ext. 2123**  
**title9@urshan.edu**

The institution has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services on and/or off campus as well as additional remedies to prevent contact between a complainant and an accused party, such as changes to housing, academic, protective orders, transportation and working situations, if reasonably available. See *Assistance for Victims: Rights & Options* and *Services and Resources for Victims* for more information.

The institution will make such accommodations or protective measures, if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to the local law enforcement. Students and employees should contact the Title IX Coordinator to request such accommodations.

If a report of domestic violence, dating violence, sexual assault or stalking is reported to the Institution, below are the procedures that the Institution will follow:

### **Intake, Supportive Measures, and the Right to Sign a Formal Complaint**

- Upon receiving a report (either verbally or in writing), the Title IX Coordinator will conduct an initial assessment of the complainant's immediate and ongoing safety and well-being; review the necessity for any supportive measures; give the Written Explanation of Rights and Options as required by the Clery Act and explain the process for filing a signed formal complaint.
- If the complainant only wants supportive measures and does not wish to sign a formal complaint at that time, the Title IX Coordinator will weigh the complainant's request not to proceed against their ability to provide a

nondiscriminatory environment. The Title IX Coordinator will also consider the interest of the complainant and the complainant's expressed preference for manner of resolution in making a determination on course of action.

### **Signed Formal Complaint, Coordinator Signs Complaint, Notice of Investigation/Allegation Provided**

- If the complainant does sign a formal complaint or the Title IX Coordinator signs the formal complaint on behalf of the institution to initiate the formal grievance process, then notice will be prepared and sent to the parties. \*At no time does the institution become a complainant in the matter. If the Title IX Coordinator signs the formal complaint, the named complainant retains standing throughout the process and is entitled to all of the notice and opportunity they would have as if they signed the complaint themselves regardless of whether they choose to participate or not.
- Upon issuance of the notice to the parties and the delivery of supportive measures to the complainant, the Title IX Coordinator will conduct outreach to the respondent, answer any questions they may have, and offer supportive measures to the respondent. Supportive measures may not be disciplinary in nature nor deprive either party of their access to their education. The respondent is presumed not in violation of University policy unless and until the decision maker at the conclusion of the formal grievance process determines, using the preponderance of the evidence, that it is more likely than not that the respondent engaged in Prohibited Conduct.
- If the complainant proceeds with signing a formal complaint or the institution signs such a formal complaint to initiate the formal grievance process, Urshan may consider whether emergency removal of the respondent is necessary. After conducting an individualized safety and risk analysis, Urshan may remove a respondent from an Urshan program or activity on an emergency basis, if it determines that a respondent poses an immediate threat to the physical health or safety of any individual arising from the allegations of Prohibited Conduct that justifies removal. The seriousness of the allegations themselves will be insufficient to initiate an emergency removal.
- If the University institutes emergency removal, the respondent will receive notice and an opportunity to challenge the decision immediately following their removal. For students, the emergency removal challenges process follows the Interim Suspension provisions and process set forth in the Student Code of Conduct. Employees will be placed on Administrative Leave rather than utilizing emergency removal.
- For employees, Administrative Leave may also be warranted when

circumstances suggest the presence of respondent would significantly hinder the investigation.

### **Investigation**

- Pursuant to notice, Urshan, through a trained investigator(s), will conduct an adequate, reliable, and impartial investigation into the facts of the case and will interview the complainant, respondent, witnesses, and/or others who may have relevant information. The investigation will also include the collection of evidence deemed relevant to the case including but not limited to electronic or other records of communications between the parties or witnesses (via voice-mail, text message, email and social media sites), photographs (including those stored on computers and smartphones), diagrams and medical records (subject to the consent and waiver of privilege of the applicable party).
- The sexual history of a complainant or respondent will never be used to prove character or reputation. Moreover, evidence related to the prior sexual history of the complainant is generally not relevant to the determination of a policy violation and will be considered only in very limited circumstances. For example, if the existence of consent is at issue, the sexual history between the parties may be relevant to help understand the manner and nature of communications between the parties and the context of the relationship, which may have a bearing on whether consent was sought and given during the incident in question. Urshan will provide the complainant and respondent timely and equal access to information that will be used during any informal and formal process.
- Urshan will provide the complainant and respondent an equal opportunity to participate in any process and to present evidence and/or witnesses.

### **Preliminary Report, Feedback Period, Final Investigation Report, Notice to the Parties**

- At the conclusion of the investigation, the investigator will draft a Preliminary Report summarizing the fact-finding related to the case. In general, the investigator will not include information that is irrelevant, more prejudicial than probative, immaterial, or merely a personal opinion.
- The investigator will deliver the draft report to the Title IX Coordinator providing only the facts of the matter and not rendering any decision regarding whether Prohibited Conduct occurred. The Title IX Coordinator will issue notice of the draft report, provide a link to, or attach said report, and explain the process to receive feedback prior to the finalization of the investigative process. The parties and their respective advisors are strictly prohibited from disseminating the report, including details from the report. Unauthorized

dissemination will result in potential conduct charges.

- The parties will have ten business days to provide a response back to the Title IX Coordinator of the draft investigative report noting any inaccurate information or additional information or evidence they would like considered. The Title IX Coordinator will provide the feedback to the named investigator(s), who will review the feedback provided by the parties, determine what corrections should be made to the draft report, if any, and determine if based on the feedback received if further investigation is required. Once the investigator has completed those actions, the investigator will draft the final investigative report and add a section entitled "Summary of Relevant Evidence," which will note the relevant evidence in the matter. The final report will be provided to the Title IX Coordinator, who will draft notice of the availability of the final report and send notice as well as the final report to the parties and their respective advisors.

### **The Live Hearing**

- The Title IX Coordinator will also provide, within that notice or in a separate notice, information regarding the live hearing, including procedural information about the date, time, and format for the live hearing, as well as the name of the decision maker(s) who will preside over the hearing to the parties. The final report will then be sent to the decision maker. The live hearing may not be held less than 10 days from the date the parties and their advisors are provided with the final report. The parties will have three business days from the date of receiving the name of the decision maker to request an alternate decision maker. Requests for an alternate decision maker should be sent to the Title IX Coordinator via email and will only be considered if the party alleges bias or conflict of interest and provides supporting documentation as to why they believe the decision maker is biased or has a conflict of interest. The Title IX Coordinator is the final arbiter with regard to the replacement of a decision maker.
- If the parties wish to provide any response to the final report, they may direct said response to the Title IX Coordinator in advance of the live hearing, who will provide it to the named decision maker.
- The live hearing will be held. Urshan does not hold live hearings in person, but rather uses technology to allow the decision maker, the parties, their advisors, and any invited witnesses, to participate remotely in real time, with the ability to be seen and heard. The decision maker is responsible for conducting the hearing. The Title IX Coordinator may join the live hearing to function as the hearing coordinator managing hearing logistics, including providing parties with advance information of what to expect in the hearing and managing the virtual platform, including muting, or unmuting participants and allowing

people in and out of waiting/break out rooms.

- Urshan uses a single decision maker process. The decision maker presides over the hearing, may ask questions of the parties and witnesses, listens to testimony provided, and will be the sole determiner with regard to whether or not a policy violation occurred. The decision maker may be an employee of Urshan, or a contractor retained by the institution. The decision maker will be a trained individual in accordance with the 2020 Title IX regulations and the Clery Act.
- A party may participate or not participate in the hearing. No inference with regard to responsibility will be made based solely on an individual's participation. If a party does not appear to be cross-examined, prior statements made in the investigation may still be considered by the decision maker.
- In the live hearing, no party may directly examine the other party or any witness. The role of conducting cross examination is conducted by the advisor for the party. If a party does not have an advisor by the issuance of the final report, then Urshan will appoint an advisor strictly for the purposes of conducting cross examination. There is no fee or charge to a party to receive an Urshan-appointed advisor.
- The role of the advisor in the live hearing is to ask the questions of the other party and witnesses that their party requests they ask. The advisor may not object to questions asked of their party nor be disruptive in the proceeding. Opening and closing statements are not permitted in the live hearing. Any evidence introduced at the live hearing must be genuinely new—that is, it must not have been known or reasonably available during the investigation phase. The decision-maker may consider such evidence only if it meets this standard and is relevant to the allegations.
- The decision maker will complete the hearing and will not render a decision regarding responsibility at the immediate conclusion of the hearing. The decision maker has ten business days to issue the written determination regarding responsibility. The written determination of responsibility will be provided to the Title IX Coordinator.

#### **Written Outcome and Determination of Sanctions, If Applicable**

- If the respondent is determined, by the preponderance of the evidence, not to be in violation of University policy, then the Title IX Coordinator will issue notice of the outcome and provide the parties and their respective advisors with the determination letter and appeal rights.

- If the outcome letter determines that the respondent is in violation of University policy, then the process for determining sanctions depends on the role of the respondent. If the respondent is a student, the Dean of Students is responsible for determining the appropriate sanction. If the respondent is a faculty or staff member, that responsibility falls to the Executive Vice President. The decision on sanctions will be made upon notice that the respondent has been found in violation of University policy.
- The Title IX Coordinator communicates, simultaneously and in writing, the final determination of responsibility and any sanctions, if applicable, to the parties and their respective advisors. For student respondents, the Coordinator delivers this information directly. In cases involving faculty or staff, the Coordinator collaborates with the Executive Vice President to ensure that both the determination and any resulting sanctions are clearly conveyed.
- The complainant and the respondent and their respective advisors receive the outcome and if applicable, the associated sanctions. Communications are sent via Urshan’s official email system. If a party no longer maintains an Urshan email account, the notice is sent via U.S. Mail. In certain cases, limited private information may be disclosed to relevant personnel, such as a Department Chair, Athletics, or the Registrar, but only to the extent necessary to implement the sanctions. Such disclosures are made at the discretion of the Title IX Coordinator and are strictly limited to the purpose of fulfilling institutional responsibilities.

**Right to Appeal Outcome**

- Both the complainant and the respondent have an equal right to appeal the determination of responsibility. Appeals must be submitted in writing to the Title IX Coordinator within five (5) business days of receiving the notice of outcome. For timely and appropriate appeals, the appeal for student as the respondent cases will be reviewed by the Urshan Student Disciplinary Committee (minus the presence of a student representative). For employee cases, the appeal will be heard by the President of the University or its Senior Leadership Committee.

Grounds for appeal are limited to the following:

- A procedural irregularity that affected the outcome;
- The discovery of new evidence that was not reasonably available at the time of the determination and could affect the outcome;
- A conflict of interest or bias involving Title IX personnel that affected the outcome.

Sanctions imposed as a result of a Title IX determination will generally be stayed

pending the outcome of any timely appeal. This means that disciplinary sanctions will not be implemented until the appeal process has concluded. However, the institution reserves the right to enforce certain sanctions immediately if a delay poses a threat to the safety or well-being of the campus community, interferes with the educational environment, or compromise the integrity of institutional operations. In such cases, the rationale for immediate enforcement will be documented and communicated to both parties.

Supportive measures may continue throughout the appeal process, regardless of whether sanctions are stayed.

### **The Formal Grievance Process**

All persons involved in the intake through the resolution of complaints of Prohibited Conduct are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking and instructed on how to conduct effective investigations and administer a conduct process that protects the safety of victims and promotes accountability. In proceedings under this policy, the standard of proof used to determine whether a violation of this policy has occurred is a preponderance of evidence, which means it is more likely than not that Prohibited Conduct occurred.

### **Sanctions**

The purpose of administering disciplinary action(s) is to hold members of institution accountable for their actions, promote the safety and well-being of all members of the Urshan community (not just the complainant) and ensure that unacceptable behavior does not occur.

Urshan has the right to determine the level of corrective action it deems suitable when addressing unacceptable, inappropriate, unethical, or illegal behavior. In determining the appropriate disciplinary action, the institution will attempt to fairly fit the action to the violation seen in total context.

For example, severe discipline may be imposed for a relatively minor violation, which has been repeated despite prior warning, more lenient discipline may be imposed for a relatively serious violation when extenuating circumstances have been demonstrated.

### **Disciplinary Action for Employees**

Disciplinary actions for Urshan employees may include any combination of the following:

- Written apology to a person, or group, whose rights the respondent may have infringed.
- Mandatory educational programming, which could include alcohol/ drug abuse awareness, sexual harassment prevention training, or batterer intervention instruction.

- Paid or unpaid administrative leave.
- Demotion or reassignment.
- Written notice of unacceptable behavior that is placed in the employee's permanent file.
- Termination of employment.
- Termination of employment with associated "no trespass" notification.

### **Disciplinary Action for Students**

Disciplinary actions for Urshan students may include any combination of the following:

- Written apology to a person, or group, whose rights the respondent may have infringed.
- Mandatory educational programming, which could include alcohol/ drug abuse awareness, sexual harassment prevention training, or batterer intervention instruction.
- Change of class schedule or loss of special privileges.
- Student Life restriction/ probation.
- Residence hall suspension.
- Residence hall expulsion.
- Suspension from the University or seminary.
- Expulsion from the University or seminary.
- A suspension or expulsion from resident hall, University , or seminary with associated "no trespass" notification.

### **Informal Resolution Process**

In accordance with the Title IX regulations issued in 2020, Urshan offers an Informal Resolution Process as a voluntary alternative to the formal grievance procedure for resolving allegations of sexual harassment. Informal resolution may include facilitated discussions, mediation, or restorative practices, and is only available after a signed formal complaint has been filed.

Participation in informal resolution is optional and requires the informed, written consent of both the complainant and the respondent. Prior to engaging in the process, parties will receive a written notice disclosing the allegations, the nature of the process, and any consequences that could result from resolving the matter informally (e.g., a mutually agreed-upon outcome).

Please note that informal resolution is not permitted where the allegations involve sexual harassment of a student by an employee. Either party may withdraw from the informal resolution at any time before a resolution is finalized, in which case the formal grievance process will resume.

As part of the informed notice, parties will also be advised of how any information disclosed during the informal resolution process will be maintained, recorded, or used by the institution, including limits on confidentiality and access. No act in which alleged violence is threatened or engaged in will qualify for resolution under the Informal Resolution Process.

### **Timeline**

Typically, the investigation under this policy will not exceed 60 days. This timeframe may be extended for good cause, which may exist if additional time is necessary to ensure the integrity and completeness of the investigation, to comply with a request by external law enforcement for temporary delay to gather evidence for a criminal investigation, to accommodate the availability of witnesses, to account for complexities of a case, including the number of witnesses and volume of information provided by the parties, or for other legitimate reasons. The investigator will notify the Coordinator who will then notify the parties in writing of any extension of this timeframe and the reason for such extension. The complainant and respondent will be notified, in writing, throughout the process by the Title IX Coordinator in regard to the major timeframes of the process to include the start of an investigation and the policy violation that is being alleged, any delay in the investigation, the conclusion of the investigation, and determination of the outcome resolution and any related appeals.

At the request of law enforcement, the investigator may delay Urshan's investigation temporarily while an external law enforcement agency is gathering preliminary evidence. The Coordinator will promptly resume Urshan's investigation when notified that law enforcement has completed the evidence-gathering stage of its criminal investigation. Urshan will not wait for the conclusion of a criminal investigation to proceed with its' administrative investigation.

### **Coordination with Law Enforcement**

At the request of law enforcement, the investigator may delay Urshan's investigation temporarily while an external law enforcement agency is gathering preliminary evidence. The Coordinator will promptly resume Urshan's investigation when notified that law enforcement has completed the evidence-gathering stage of its criminal investigation. Urshan will not wait for the conclusion of a criminal investigation to proceed with its' administrative investigation.

### **Obligation to Provide Truthful Information**

Submitting or providing false or misleading information in bad faith or with a view to personal gain or intentional harm to another in connection with an incident of sexual misconduct or other forms of prohibited conduct is prohibited and subject to disciplinary sanctions under Urshan's related policies. This provision does not apply to

reports made or information provided in good faith, even if the facts alleged in the report are not later substantiated.

### **Recordkeeping**

Urshan will retain all records related to reports of Prohibited Conduct under this policy in the office of the Title IX Coordinator for a period of seven (7) years, regardless of case outcome. Urshan's Title IX Coordinator will destroy all case records after the applicable retention period; however, a permanent record of "responsible finding" and the sanctions imposed as a result of an investigation will remain on a student's permanent record in the Registrar's Office.

### **Non-Retaliation Statement**

It is unlawful under Title IX and a violation of Urshan policy to retaliate against any individual who has brought a good-faith report of Prohibited Conduct or who has assisted in the investigation of a complaint. Retaliation, whether actual or threatened, destroys the sense of community and trust that is critical to a learning and work environment. Urshan considers acts or threats of retaliation in response to such disclosures or participation to constitute a serious violation of Urshan policy, which may result in disciplinary action, up to and including dismissal, against the individual responsible for retaliation.

Retaliation includes threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging in activity protected under this policy. Retaliation may be present even where there is a finding of "no responsibility" on the allegations of prohibited conduct.

NOTE: Adverse actions do not include petty slights and annoyances, such as stray negative comments in an otherwise positive or neutral evaluation, "snubbing" a colleague, not talking to a student, or negative comments that are justified by a student or employee's poor academic or work performance or history.

If you believe that you are being retaliated against because of making a report or assisting in an investigation in violation of this policy, you should promptly report your concerns to the Title IX Coordinator.

### **Annual Review**

Urshan will review and update this policy as needed or as required by law. Urshan will evaluate, among other things, any changes in legal requirements, existing Urshan resources, and the resolution of cases from the preceding year (including, but not limited to, timeframes for completion and sanctions and remedies imposed). If there is a change in the law that is in conflict with this policy or procedure, then Urshan will comply with law and update this policy; however, when this occurs, Urshan may provide

the updates to the parties in their respective notice documents while the policy is updated.

### **Assistance for Victims: Rights & Options**

Regardless of whether a victim elects to pursue a criminal complaint or whether the offense is alleged to have occurred on or off campus, the institution will assist victims of sexual assault, domestic violence, dating violence, and stalking and will provide each victim with a written explanation of their rights and options. Such written information will include:

- the procedures victims should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred and their right to file criminal charges;
- information about how the institution will protect the confidentiality of victims and other necessary parties;
- a statement that the institution will provide written notification to students and employees about victim services within the institution and in the community;
- a statement regarding the institution's provisions about options for, available assistance in, and how to request accommodations and protective measures; and
- an explanation of the procedures for institutional disciplinary action

### **Services and Resources for Victims**

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Urshan will provide written notification to individuals about the availability of resources and services including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services on and/or off campus. The institution will also explain as possible remedies to prevent contact between a complainant and an accused party, such as changes to housing, academic, protective orders, transportation and working situations, if reasonably available. If the individual wishes, Urshan can help connect them with the appropriate local law-enforcement agency to make a report.

These resources include the following:

## ON-CAMPUS Services for Victims

Service	Description	Service Provider	Contact Information
Counseling	A counselor is on campus Monday through Tuesday to meet with students by appointment. The initial session is covered by the students' on-campus fees each semester.	Kevin Payne	Durr Administration Building (A) Room 206 314-838-8858, ext. 3110 kpayne@urshan.edu OR netmender@yahoo.com
Health	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Mental Health	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Victim Advocacy	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Legal Assistance	Office of the Title IX Coordinator (Legal Assistance, ask a question, File a Complaint)	Jereme Watson	Durr Administration Building (A) Room 418 314-838-8858, ext. 2123 title9@urshan.edu
Visa and Immigration Assistance	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Student Financial Aid	Financial Aid Assistance	Financial Aid Office	Durr Administration Building (A) Room 103 314-838-8858, ext. 3222 finaiddirector@urshan.edu

## OFF-CAMPUS Services for Victims

Resource	Address	Contact Information
Wentzville Police Department (Law Enforcement)	1019 Schroeder Creek Blvd, Wentzville, MO 63385	636-327-5105
SSM Health – St. Joseph Hospital, Wentzville (Health and Mental Health)	500 Medical Dr., Wentzville, MO 63385	636-327-1000
SSM Health – St. Joseph Hospital, Lake Saint Louis (Health, including SANE Exams, and Mental Health)	100 Medical Plaza, Lake Saint Louis, MO 63367	636-327-5105
St. Charles County Victim Services (Victim Advocacy)	300 N. 2 <sup>nd</sup> St., Suite 601 St. Charles, MO 63301	636-949-7355
Tim Bizelli, Counseling, LLC (Counseling)	5933 RT-94 W Ste 101, Weldon Spring, MO 63304	636-345-1106 <a href="https://bizellicounselinghelps.com/">https://bizellicounselinghelps.com/</a>
Behavioral Health Resources (Mental Health and Counseling)	12647 Olive Blvd Creve Coeur, MO 63141	314-469-6644 (24/7 Hotline) 800-811-4760 (24/7 Hotline) <a href="https://bhrstl.com/">https://bhrstl.com/</a>
Safe Connections: St. Louis (Victim Advocacy/Support and Legal Assistance)	2165 Hampton Ave. St. Louis, MO 63139	314-531-2003 (24/7 Hotline) 314-646-7500 (Office)
Missouri Crisis Line (Victim Advocacy)		888-761-HELP Text HAND to 839863

Life Crisis – Suicide Hotline		314-531-2003
RAINN – National Hotline		800-656-HOPE <a href="https://rainn.org/">https://rainn.org/</a>
St. Charles County Protective Orders (Orders of Protection)	11 <sup>th</sup> Judicial Circuit Court, 300 North 2 <sup>nd</sup> Street, St. Charles, MO 63301	636-949-3080
Wentzville Courthouse (For Victim Advocacy and Legal Assistance)	1001 Schroeder Creek Blvd, Wentzville, MO 63385	636-639-2193
Visa and Immigration Assistance	To help a victim learn how to apply, contact USCIS.	1-800-375-5283, or go to <a href="https://www.dhs.gov/case-assistance">https://www.dhs.gov/case-assistance</a>
Victims can learn more about applying for a T-Visa and/or U-Visa for victims of certain VAWA crimes who are non-US citizens		<a href="https://visahelp.us.com/">https://visahelp.us.com/</a>
Financial Aid	MO Crime Victim’s Compensation Program	<a href="https://dps.mo.gov/dir/programs/cvc/">https://dps.mo.gov/dir/programs/cvc/</a>

Other resources available to persons who report being the victim of sexual assault, domestic violence, dating violence, or stalking, include:

<https://rainn.org/> – Rape, Abuse and Incest National Network

<https://www.justice.gov/ovw/sexual-assault> – Department of Justice

<https://victimconnect.org/> – National Center for Victims of Crime

<https://www.ed.gov/about/ed-offices/ocr> – Department of Education, Office for Civil Rights

### **How to Be an Active Bystander**

Bystanders play a critical role in the prevention of sexual and relationship violence. They are “individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or

do something about it.”<sup>6</sup> We want to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. Below is a list of some ways to be an active bystander.<sup>7</sup> Further information regarding bystander intervention may be found. If you or someone else are in immediate danger, dial 911. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are OK.
2. Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

## Risk Reduction

With no intent to victim blame and recognizing that only abusers are responsible for their abuse, the following are some strategies to reduce one’s risk of sexual assault or harassment (taken from Rape, Abuse, & Incest National Network, [www.rainn.org](http://www.rainn.org)).

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

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<sup>6</sup>Burn, S.M. (2009). A situational model of sexual assault prevention through bystander intervention. *Sex Roles, 60*, 779-792.

<sup>7</sup>Bystander intervention strategies adapted from Stanford Institution’s Office of Sexual Assault & Relationship Abuse.

9. **When you go to a social gathering, go with a group of friends.** Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
10. **Trust your instincts.** If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).
11. **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
12. **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
13. **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
14. **If you suspect you or a friend has been drugged, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).** Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).
15. If you need to get out of an uncomfortable or scary situation here are some things that you can try:
  - a. **Remember that being in this situation is not your fault.** You did not do anything wrong; it is the person who is making you uncomfortable that is to blame.
  - b. **Be true to yourself.** Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
  - c. **Have a code word with your friends or family** so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
  - d. **Find a viable reason to leave.** Present a legitimate reason, even if vague, to leave rather than to stay and be uncomfortable, scared, or worse. Some reasons you could use are not feeling well, having somewhere else that you need to be, etc.
16. **Try to think of an escape route.** How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
17. **If you and/or the other person have been drinking,** you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

## Education and Prevention Programs

In the 2018–2019 academic year, the institution began utilizing the digital training platform VectorSolutions to educate its community members on issues related to domestic violence, dating violence, sexual assault, and stalking. The initial focus on staff and faculty training was implemented ahead of the institution’s final accreditation visit. Currently, the institution continues to use Vector as its primary digital platform, encouraging completion of training modules by all students. Completion may be enforced through imposing student life restriction or other disciplinary sanctions at the discretion of the Office of Student Services.<sup>8</sup>

In addition, the institution has partnered with local law enforcement agencies and/or licensed instructors to provide self-defense and safety awareness sessions on campus. With the establishment of the Security Department, we are continuing to explore additional training options and resources for the Urshan community. Through Vector, we also utilize the platform’s course catalog library to provide ongoing training across various areas, including compliance, security, and overall campus safety.

## Sex Offender Registry and Access to Related Information

In the State of Missouri, the Missouri State Highway Patrol maintains the official Sex Offender Registry. Information on registered sex offenders in Missouri, including any employed by, carrying on a vocation at, or enrolled as a student at a post-secondary institution, can be accessed through the Missouri State Highway Patrol website:

<https://www.mshp.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>

## Hazing Policies & Prevention Programs

The purpose of this policy is to establish a clear and comprehensive framework for preventing and addressing hazing activities within the community of Urshan University. In accordance with the Stop Campus Hazing Act of 2024 (SCHA), this policy aims to promote a safe, respectful, and inclusive environment for all students, faculty, and staff. The scope of this policy encompasses all Urshan University affiliated organizations, events, and activities, whether on or off campus, and applies to all members of the university community.

### Hazing Definitions (SCHA & Missouri)

The SCHA defines the term “hazing”, for purposes of reporting statistics on hazing incidents as any intentional, knowing, or reckless act committed by a person (whether

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<sup>8</sup> This section was updated December 11, 2025, to reflect clarifications made in institutional policy for compliance.

individually or in concert with other persons), against another person or persons regardless of the willingness of such other person or persons to participate, that is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including:

- whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
- causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- causing coercing, or otherwise inducing another person to perform sexual acts;
- any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- any activity against another person that includes a criminal violation of local, State, Tribal or Federal law; and
- any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

"The term 'student organization', for purposes of reporting under paragraph (1)(F)(iv) and paragraph (9)(A), means an organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution." – 20 U.S.C. 1092(f)(6)(A)(VII).

Examples of student organizations (established, recognized/registered, and unrecognized) include: Registered student organizations; intramural sports; recreational/club sports groups; performing arts groups; honor societies; choir; athletic teams and team subgroups (i.e. linemen or quarterbacks' groups); student government; residence hall groups; unrecognized groups (i.e. suspended, banned, derecognized, secret societies).

The State of Missouri defines hazing as (RSMo §578.365):

Hazing – consent not a defense – penalties – defenses, immunity from prosecution.

1. This section shall be known and may be cited as "Danny's Law".
2. A person commits the offense of hazing if he or she knowingly, actively, and not under duress participates in, solicits another person to participate in, or causes or plans a willful act, occurring on or off the campus of a public or private college or university, directed against a student or a prospective member, current

member, or former member of an organization operating under the sanction of a public or private college or university, that recklessly endangers the mental or physical health or safety of a student or prospective member, current member, or former member for the purpose of initiation or admission into or continued membership in any such organization to the extent that such person is knowingly placed at probable risk of the loss of life or probable bodily or psychological harm. Acts of hazing include:

- i. Any activity which recklessly endangers the physical health or safety of the student or prospective member, current member, or former member, including but not limited to physical brutality, whipping, beating, branding, exposure to the elements, forced consumption of any food, liquor, drug or other substance, or forced smoking or chewing of tobacco products;
  - ii. Any activity which recklessly endangers the mental health of the student or prospective member, current member, or former member, including but not limited to sleep deprivation, physical confinement, or other extreme stress-inducing activity; or
  - iii. Any activity that requires the student or prospective member, current member, or former member to perform a duty or task which involves a violation of the criminal laws of this state or any political subdivision in this state.
3. Public or private colleges or universities in this state shall adopt a written policy prohibiting hazing by any organization operating under the sanction of the institution.
  4. Nothing in this section shall be interpreted as creating a new private cause of action against any educational institution.
  5. **Consent is not a defense to hazing.** Section 565.010 does not apply to hazing cases or to homicide cases arising out of hazing activity.
  6. The offense of hazing is a class A misdemeanor, unless the act creates a substantial risk to the life of the student, prospective member, current member, or former member, in which case it is a class D felony.
  7. A person shall not be guilty of the offense of hazing if the person establishes all of the following:
    - i. That he was present at an event where, as a result of hazing, a person appeared to be in need of immediate medical assistance;
    - ii. That he was the first person to call 911 or campus security to report the need for immediate medical assistance;
    - iii. That he provided his own name, the address where immediate medical assistance was needed, and a description of the medical issue to the 911 operator or campus security at the time of the call; and
    - iv. That he remained at the scene with the person in need of immediate medical assistance until medical assistance, law enforcement, or campus security arrived and that he cooperated with such personnel on the scene.
  8. Notwithstanding subsection 7 of this section to the contrary, a person shall be immune from prosecution under this section if the person establishes that the

person rendered aid to the hazing victim before medical assistance, law enforcement, or campus security arrived on the scene of the hazing event. For purposes of this subsection, the term "aid" includes, but is not limited to, rendering cardiopulmonary resuscitation to the victim, clearing an airway for the victim to breathe, using a defibrillator to assist the victim, or rendering any other assistance to the victim that the person intended in good faith to stabilize or improve the victim's condition while waiting for medical assistance, law enforcement, or campus security to arrive.

9. For purposes of this section, the term "former member" means a person who is no longer affiliated with the chapter of the organization operating under the sanction of the public or private college or university, but who may be affiliated with the national chapter of the organization.

### **Campus Hazing Transparency Report**

The Campus Hazing Transparency Report (CHTR) is an accurate and publicly available report of all violations of the policy regarding hazing in accordance with the SCHA. The categories for disclosure are: the name of the student organization, general description of the violation, institutional findings, sanctions and disciplines imposed, investigation disposition, and relevant dates and times. The first transparency report must be publicly available by December 23, 2025.

Since July 1, 2025, pursuant to Section 485(f)(9) of the Higher Education Act, Urshan University and Graduate School of Theology has had no qualifying incidents of hazing and therefore is not required to publish a Campus Hazing Transparency Report for the 2025 year. Information regarding institutional hazing policies is provided below.

All hazing policy statements apply to all campuses unless otherwise indicated. Questions regarding hazing policies or related compliance matters should be directed to the Associate Director of Student Services and Clery Coordinator, Rachele Holbrook (rholbrook@urshan.edu).<sup>9</sup>

### **Urshan Hazing Policy**

Urshan University strictly prohibits any form of hazing, defined as any activity that endangers the mental or physical health, or dignity, of an individual, regardless of their willingness to participate. This policy applies to all students, staff, and affiliated organizations.

Any incidents of hazing must be reported immediately to Campus Security, either in person at their office in Building H, by calling 720-975-6855, or via email at security@urshan.edu; to the Clery Coordinator, Rachele Holbrook, located in the Durr

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<sup>9</sup> This section was updated December 11, 2025, regarding CHTR compliance.

Administration Building (A; Room 417), by calling 314-838-8858 ext. 2117, or emailing rholbrook@urshan.edu; or to any designated Campus Security Authority (CSA).

Reports may be made confidentially. Retaliation against any person who reports hazing or participates in an investigation is strictly prohibited.

All reports will be thoroughly investigated in accordance with the SCHA. Violations of this policy will result in disciplinary actions, which may include suspension or expulsion. All sanctions and disciplinary measures will be administered by the Office of Student Services.

### **Prevention Programs & Awareness<sup>10</sup>**

Urshan is committed to preventing hazing and promoting a culture of safety, respect, and accountability. The institution will implement ongoing prevention initiatives designed to reduce hazing risks and ensure all community members understand their roles in maintaining a positive campus environment.

In addition to annual hazing prevention education for all students and employees, the institution will maintain broader prevention efforts that may include awareness campaigns, bystander-intervention training, onboarding modules for new students and new employees, and regular communication from administrative leadership reinforcing expectations. Programming will highlight how to recognize hazing behaviors, safe alternatives for team-building and community bonding, and clear steps for reporting concerns.

Targeted training will continue to be provided for Campus Security Authorities, student organization leaders, and Residence Life staff to ensure those in higher-impact roles are prepared to identify, interrupt, and report potential hazing. The institution will routinely assess its prevention strategies and refine them based on emerging best practices, campus climate data, and regulatory guidance.

## **FIRE SAFETY REPORT FOR CALENDAR YEARS 2022–2024**

In addition to the Annual Security Report, Urshan publishes an Annual Fire Safety Report that provides information about fire safety policies, procedures, and fire statistics for all student residential facilities owned or controlled by the institution.

Urshan Graduate School of Theology (UGST) does not operate separate graduate student housing. However, UGST students may be assigned to designated floors within the institution-owned residence hall, Building H. Because this facility houses

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<sup>10</sup> This section was updated December 11, 2025, to reflect changes in institutional policy for SCHA compliance.

undergrad and UGST students, it is included in the Annual Fire Safety Report, and fire statistics for Building H are reported to the U.S. Department of Education.

The following section details federally mandated disclosures related to fire safety in student residential housing facilities.

## **Fire Log**

The institution maintains a fire log, which is managed the Office of Student Services. The log records all reported fires occurring in University-owned or controlled residential facilities. The fire log for the most recent 60 days is available for public view at the reception desk or the Office of Student Services during normal business hours (8:00 a.m. to 5:00 p.m., Monday through Friday, excluding holidays). Logs for periods prior to the most recent 60 days are also available for review during business hours but must be requested at least two business days in advance.

## **Mandatory, Supervised Fire Drills in Student Housing Facilities**

Urshan conducts two mandatory, supervised fire drills each academic year in every University-owned or controlled student housing facility. When a fire alarm is activated, all occupants are required to immediately evacuate the building and follow the fire evacuation procedures outlined in University safety materials and reinforced by Residence Life staff. Failure to evacuate during a fire alarm is a violation of University policy.

## **Fire Safety-Related Student Housing Policies**

The following fire safety policies apply to all Urshan residence facilities.

### **Appliances**

Open-face burners and any items that present a fire hazard are strictly prohibited in the residence halls. Cooking appliances, including, but not limited to, hot pots, hot plates, deep fryers, electric skillets, toasters, and any device with exposed heating elements, are not permitted in student rooms. Violations of this policy may result disciplinary action, including fines and the removal or confiscation of prohibited items.

In addition, any room equipped with a microwave must also have a properly gauged fire extinguisher placed in a visible and accessible location (see *Urshan University Student Handbook*, p. 63).

### **Mandatory Evacuation**

All residents are required to evacuate a building during a fire alarm or scheduled fire drill, and to comply with Resident Life staff during such events.

## **False Alarms**

Intentionally activating a fire alarm when no fire or emergency exists is a serious violation of University policy. False alarms endanger the safety of residents and emergency personnel, create unnecessary disruption, and may delay response to actual emergencies. Any student found responsible for initiating a false alarm (including by igniting or attempting to ignite a fire) will be subject to disciplinary action, including fines, and may be referred to law enforcement for further legal action.

## **Open Flame**

Candles and incense are strictly prohibited in the residence halls. Smoking is also prohibited anywhere on campus. Violations of this policy may result disciplinary action, including fines and the removal or confiscation of prohibited items.

## **Tampering**

Deactivating, damaging, obstructing, or destroying fire safety equipment, alarms, or other safety systems is strictly prohibited. Any student found responsible for tampering with fire safety equipment or systems will be subject to disciplinary action, including fines, and may be referred to law enforcement for further legal action.

## **Fire Safety Drill Procedures and Protocols**

### **Procedures for Student Housing Evacuation**

All fire alarms are to be treated as an indication of a real fire until competent authority (e.g., Fire Department personnel) advises otherwise.

In the event of a fire alarm or fire, all occupants must evacuate the building immediately using the designated evacuation routes. Elevators must not be used during fire evacuations.

If flames or smoke are present in the primary escape route, occupants should use an alternate route. Anyone in a smoke-filled area should stay low to the floor and crawl under the smoke until they reach a safe location.

Once outside, building occupants should assemble in the pre-determined safety areas away from the building so that everyone can be accounted for. During curfew times (12:00 a.m. to 5:00 a.m.), occupants must remain at the assembly area until released by Residence Life staff and/or police or fire officials.

### **Procedures Students and Employees Should Follow in Case of a Fire**

In the event of a fire, the University expects that all campus community members will evacuate by the nearest exit, closing doors and activating the fire alarm system (if one is present) as they leave. Once safely outside a building, it is appropriate to contact 911. Students and/or employees are informed where to relocate to by staff if circumstance warrants at the time of the alarm.

In the event fire alarms sound, Urshan policy is that all occupants must evacuate from the building, closing doors as they leave. No training is provided to students or employees in firefighting or suppression activity as this is inherently dangerous and each community member's only duty is to exit safely and quickly, shutting doors along the exit path as they go to contain the spread of flames and smoke, and to activate the alarm as they exit. At no time should the closing of doors or the activation of the alarm delay the exit from the building.

### **Reporting Fire**

Anyone who sees a fire should immediately call Campus Security (720-975-6855) or dial 911 and provide complete information about the location and type of fire. Small, contained fires (such as those limited to a wastebasket) may be extinguished with a fire extinguisher. Fires involving wood or paper may also be extinguished with water.

If the fire is larger than a wastebasket or not contained, occupants should not attempt to extinguish it. Instead, they should activate the nearest fire alarm and immediately evacuate the building.

### **If a Fire Has Already Been Extinguished**

Urshan is required to report all fires that occur in student residential facilities, even if no damage results. Anyone who sees evidence of a fire, such as burn marks or charred materials, or who learns of a fire that occurred in student housing must contact Campus Security (720-975-6855). Security personnel will document the incident, confirm that the location is safe for residents, and notify fire officials if their involvement is necessary.

### **Fire Prevention and Preparedness**

Do not tamper with, cover, or disable smoke alarms, and keep the area around them free from dust, cobwebs, paper, decorations, or any other obstructions. Be familiar with the location of the nearest fire extinguisher and ensure exit doors and escape routes remain clear at all times. Rooms with microwaves should be equipped with a properly gauged fire extinguisher or have one located within a safe and accessible proximity.

Know at least two ways to evacuate your building in case of a fire and the designated emergency assembly areas outside the building. Never use elevators during a fire emergency. Maintain a clean living or work area by keeping trash and debris to a minimum and store flammable products only as directed by the manufacturer.

Keep high-temperature items, such as light fixtures, appliances, irons, steamers, and hair styling tools, away from flammable materials. Candles, incense, and open flames are strictly prohibited in all campus buildings.

Regularly observe common areas in your building and promptly report any fire hazards or safety concerns to Campus Security or the Office of Student Services.

### **Fire Safety Education and Training Programs**

Faculty, staff, and students are required to complete annual training through VectorSolutions, which includes fire safety education and other essential safety and compliance information. Completion of this training is mandatory; students who fail to complete it will be subject to Student Life Restriction until the requirement is met.

All community members are provided with information about handling emergency situations via email, text, and various safety information (e.g. awareness, prevention, how to respond to other emergencies) handouts. Residence Life staff receive training specific to their roles and responsibilities in communicating fire safety procedures to the residents under their supervision and for assisting with fire drills in the residence halls.

### **Future Improvements to Fire Safety Systems**

All fire alarm systems are maintained at their current operational capabilities and tested in accordance with applicable regulations. The University continually plans and implements improvements to fire safety systems in conjunction with facility renovations and as deemed necessary by institutional authorities to ensure the safety of all campus community members.

## FIRE SAFETY SYSTEMS AND FIRE DRILLS

Building Name	Address	Fire Alarm Monitoring Done On-Site	Full Sprinkler System	Smoke Detector	Fire Extinguisher	Evacuation Plans and Placards	Number of Fire Drills Held Each Calendar Year
Building C	120 Apostolic Way	No, off-site	Yes, common areas and individual rooms	Yes, 82 in common areas and one in every room	15 devices	18 total, six per floor	2
Building H	900 Corporate Pkwy	No, off-site	Yes, common areas and individual rooms	Yes, 63 in common areas and one in every room	22 devices	8 total, two per floor	2

## FIRE STATISTICS 2022–2024

Building Name	Address	Number of Fires in 2022	Number of Fires in 2023	Number of Fires in 2024	Fire Number	Cause of Fire/Category of Fire	Number of Persons Treated at Medical Facility	Number of Deaths	Property Damage in USD
Building C	120 Apostolic Way	0	1	0	2023-1	Intentional/ Arson	0	0	\$100–\$999
Building H	900 Corporate Pkwy	N/A <sup>11</sup>	0	0	N/A	N/A	N/A	N/A	\$0

<sup>11</sup> Urshan did not own, lease, or control this property for Clery reporting purposes prior to 2023.

## CONTACT INFORMATION – CAMPUS SAFETY & REPORTING

### Emergency Calls

911

**720-975-6855** | Campus Security available 24/7 (excluding holidays). Office located in Building H.

### Clery Coordinator

Rachelle Holbrook

*Associate Director of Student Services & Clery Coordinator*

Durr Administration Building, Room 417

314-838-8858 ext. 2117

[rholbrook@urshan.edu](mailto:rholbrook@urshan.edu)

### Title IX Coordinator

Jereme Watson

*Director of Student Services & Title IX Coordinator*

Durr Administration Building, Room 418

314-838-8858 ext. 2123

[title9@urshan.edu](mailto:title9@urshan.edu)

### Administrative Offices

Hours: 8:00 a.m. – 5:00 p.m., Monday through Friday (excluding holidays)

Durr Administration Building

314-838-8858

<https://urshan.edu>

<https://urshan.edu/clery-act-disclosure>

<https://urshan.edu/title-ix>