

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).

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).

Because the department is newly formed, Urshan is finalizing proper licensure and training requirements for its security personnel in coordination with the municipality of Wentzville and St. Charles County ordinances. Urshan campus security personnel are

not sworn law enforcement officers and, therefore, do not possess the authority to make arrests.

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.

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

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
 - Victims of sexual discrimination or sexual violence may also report directly to 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/campussafety>).

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).

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

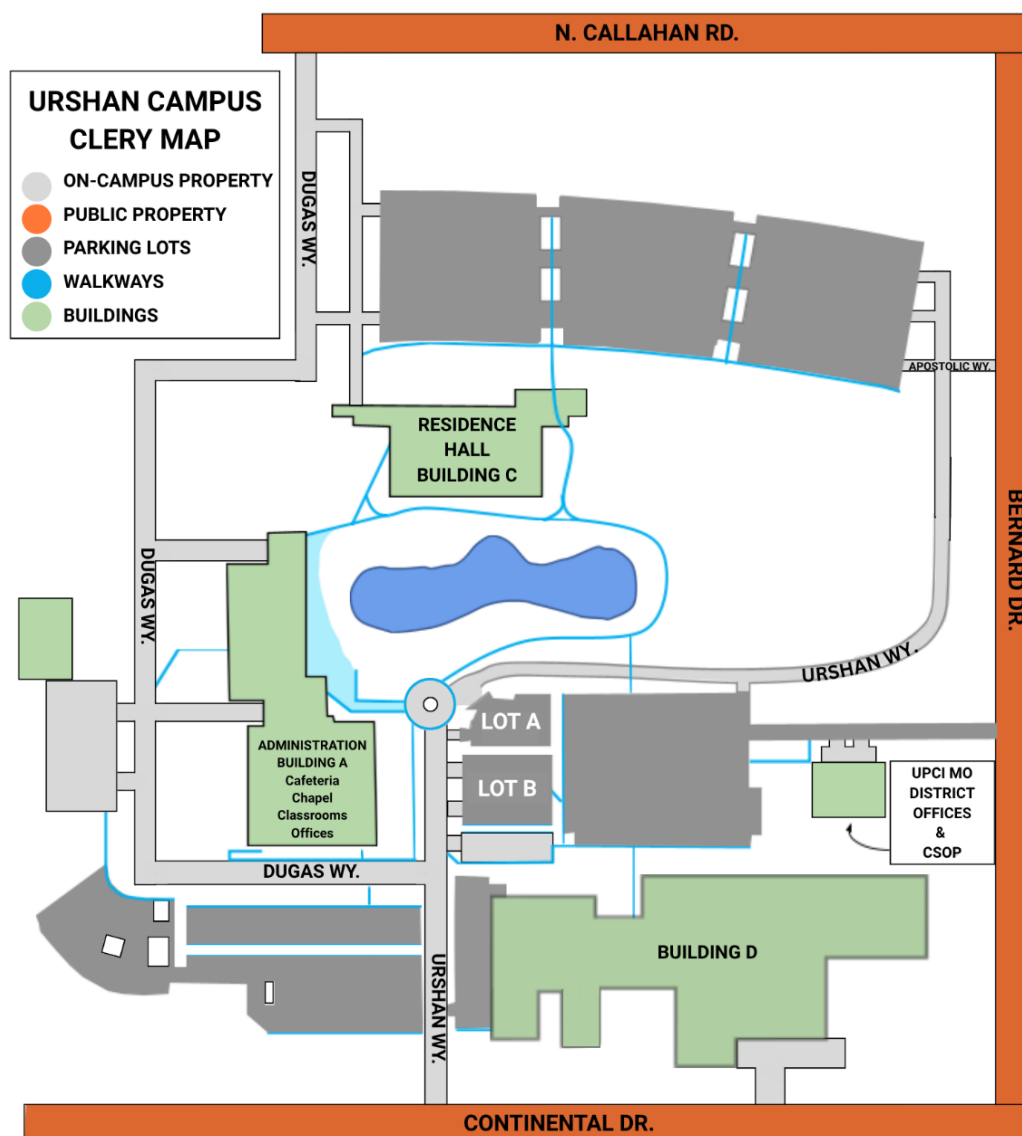
statistics chart. Currently, the only location included in this category is the off-campus residence hall, Building H, located at 900 Corporate Parkway, Wentzville, Missouri.

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	0
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

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.

VAWA Offenses Reporting Table		Geographic Locations			
Offense	Year	On-Campus Property	Non-Campus Property	Public Property	Total
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

Arrests and Disciplinary Referrals Reporting Table		Geographic Locations			
Offense	Year	On-Campus Property	Non-Campus Property	Public Property	Total
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 of 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.

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.

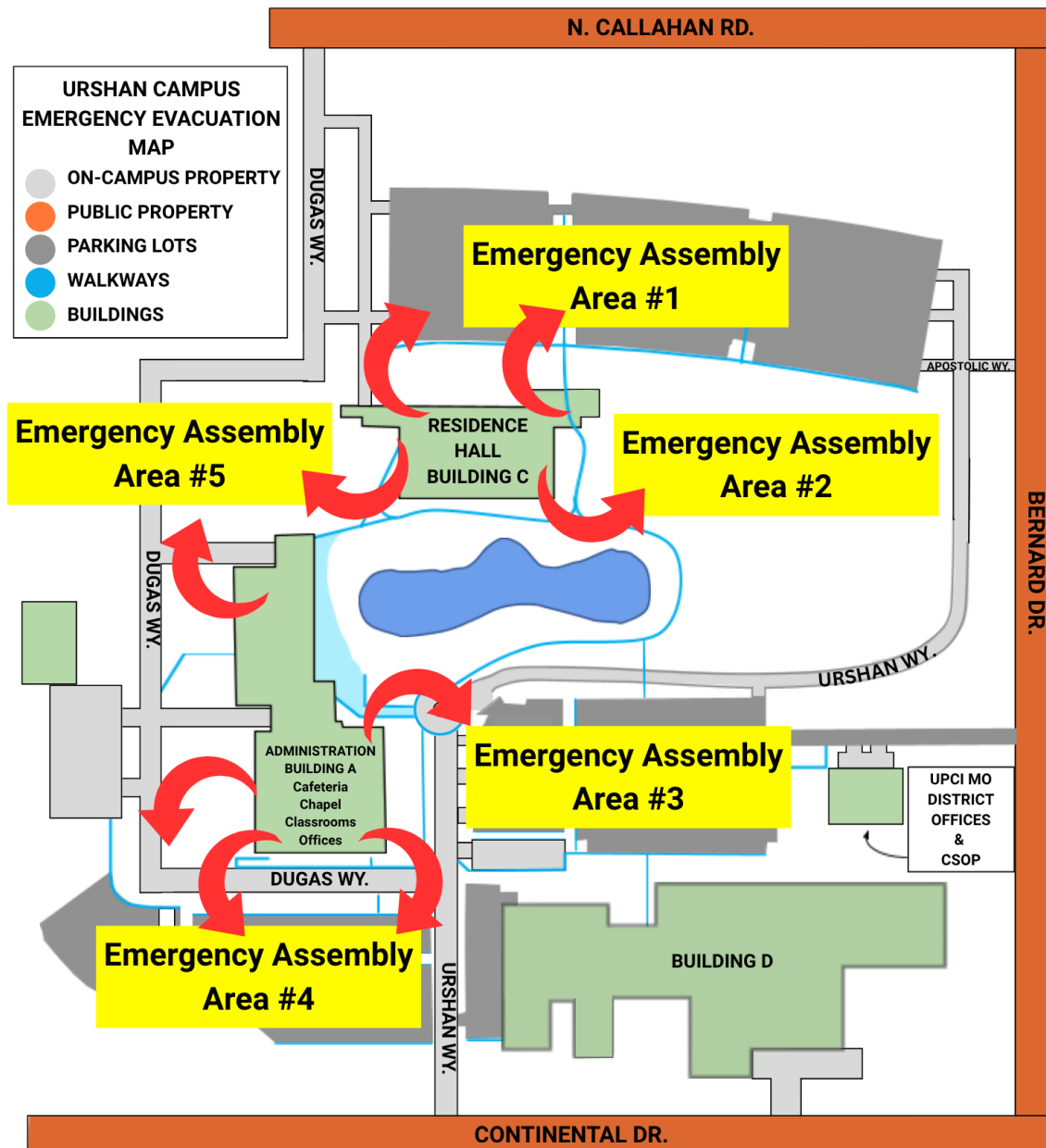
General Evacuation Procedures

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.

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 of 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).

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

Urshan University and Urshan Graduate School of Theology (hereafter “the institution” or “Urshan”) values a learning community in which all members feel secure, physically and intellectually, and prohibits all forms of sex discrimination. This includes maintaining an environment free from Prohibited Conduct as defined in the Title IX policy, including acts of sexual harassment, sexual assault, interpersonal violence (including domestic and dating violence), and sex-based stalking. Acts of retaliation are strictly prohibited. As an educational institution, Urshan affirms that acts of sex discrimination, including sexual harassment and related misconduct, undermine the integrity of the institution and will not be tolerated.

The institution's policy and resolution procedures are outlined in the “Sexual Harassment Policy and Resolution Procedure Governing Students and Employees” (hereafter referred to as the “Sexual Harassment Policy” for brevity).

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.

Consent as Defined by Urshan

While Urshan in no way condones sex outside of marriage or between anyone other than a man and his wife, "Affirmative Consent" means affirmative, conscious, and voluntary agreement to engage in sexual activity between any two persons.

Affirmative consent is required for any sexual activity to occur between two or more 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(s) to engage in the sexual activity. Affirmative consent is the concept and definition used by Urshan to determine if a violation of institutional policy occurred in acts of sexual assault.

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 pressuring, 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 Sexual Misconduct 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.

I. Force

"Force" is the use or threat of physical violence to overcome an individual's freedom of will to choose whether or not 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.

II. Intimidation

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

III. 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 blackmail. 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 or not to engage in sexual activity.

Examples of coercion include continuously pressuring someone ("wearing them down" to engage in sexual activity), threatening to "out" someone based on sexual orientation, gender identity, or gender expression (whether true or not) and 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 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.

IV. 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.

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. Urshan does not condone the use of alcohol or drugs, however, if the Complainant was under the effects of such drugs at the time of the alleged assault, Urshan will provide amnesty for purposes of this policy to the Complainant and will extend amnesty to witnesses.

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 incapacitation (from alcohol or drugs) caused the Respondent to misjudge the Complainant's incapacity.

It is the responsibility of each party to be aware of the intoxication level of the other party before engaging in sexual activity. In general, sexual activity while under the influence of alcohol or other drugs poses a risk to all parties. If there is any doubt as to the level or extent of the other individual's intoxication, it is safest to forgo or cease any sexual contact or activity.

Being intoxicated by drugs or alcohol is no defense to any violation of this Policy and does not diminish one's responsibility to obtain consent.

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."¹ 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.² Further information regarding bystander intervention may be found. If you or someone else is 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).

¹Burn, S.M. (2009). A situational model of sexual assault prevention through bystander intervention. *Sex Roles*, 60, 779-792.

²Bystander intervention strategies adapted from Stanford Institution's Office of Sexual Assault & Relationship Abuse.

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 cab 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.
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, requiring mandatory completion of training modules by all students. Completion is enforced through student life restrictions for those who do not fulfill the training requirement.

In addition, the institution has partnered with local law enforcement agencies 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.

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

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible at SSM Health, St. Joseph's Hospital, 100 Medical Plaza, Lake Saint Louis, MO or by calling 911 and asking the dispatcher for the closest hospital to the victim offering forensic evidence collection services. In MO, evidence may be collected even if you chose not to make a report to law enforcement and it is a violation of the federal Violence Against Women Act to require a victim to make a police report as a condition of having evidence collected.

It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred

within the past 96 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring or may be helpful in obtaining a protection order.

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 sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to Institution adjudicators/investigators or police.

As soon as the victim is safe, they should also report the incident to Jereme Watson, the institution's Dean of Director Services and Title IX Coordinator. Minimally, protective measures and supports for the victim may be put into place.

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 Campus Security or other law enforcement to preserve evidence in the event that the victim decides to report the incident to law enforcement or the Institution at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

Involvement of Law Enforcement and Campus Authorities

Although the institution strongly encourages all members of its community to report violations of this policy to law enforcement (including local police), it is the victim's choice whether to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, the University's Director of Student Services and Title IX Coordinator, Jereme Watson, will assist any victim with notifying law enforcement if the victim so desires.

The Wentzville Police Department may also 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 Procedures for VAWA-Related Crimes

If you have been the victim of domestic violence, dating violence, sexual assault, or stalking, you should report the incident promptly to the Title IX Coordinator/Director of Student Services by calling, writing or coming into the office to report in person and/or to Campus Public Safety (if the victim so desires.)

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

Reports of all domestic violence, dating violence, sexual assault and stalking made to Campus Public Safety will automatically be referred to the Title IX Coordinator for investigation regardless of if the complainant chooses to pursue criminal charges.

Procedures for Responding to Reports of VAWA-Related Crimes

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.

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 Jereme Watson, Director of Student Services and 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:

Incident Being Reported	Procedure Institution Will Follow
Sexual Assault	1. Depending on when reported (immediate vs delayed report), the institution will provide the complainant with access to medical care 2. Institution will assess immediate safety needs of complainant 3. Institution will assist complainant with contacting local police if complainant requests AND provides the complainant with contact information for local police department 4. Institution will provide complainant with referrals to on and off campus mental health providers 5. Institution will assess the need to implement interim or long-term protective measures, if appropriate. 6. Institution will provide the victim with a written explanation of the victim's rights and options 7. Institution will provide a "No trespass" directive to accused party if deemed appropriate 8. Institution will provide written instructions on how to apply for Protective Order 9. Institution will provide a copy of the policy applicable to Sexual Assault to the complainant and inform the complainant regarding timeframes for inquiry, investigation and resolution 10. Institution will inform the complainant of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is 11. Institution will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of sex-based discrimination or for assisting in the investigation

Stalking	1. Institution will assess immediate safety needs of complainant 2. Institution will assist complainant with contacting local police if complainant requests AND provides the complainant with contact information for local police department 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence 5. Institution will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options 7. Institution will provide a "No trespass" directive to accused party if deemed appropriate
Dating Violence	1. Institution will assess immediate safety needs of complainant 2. Institution will assist complainant with contacting local police if complainant requests AND provides the complainant with contact information for local police department 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence 5. Institution will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options 7. Institution will provide a "No Trespass" directive to accused party if deemed appropriate

Domestic Violence	1. Institution will assess immediate safety needs of complainant 2. Institution will assist complainant with contacting local police if complainant requests AND complainant provided with contact information for local police department 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence 5. Institution will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options 7. Institution will provide a "No trespass" directive to accused party if deemed appropriate
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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;
- 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

Enforcement of Protective Orders and No-Contact Orders

Urshan complies with Missouri law in recognizing orders of protection. Urshan cannot petition for an order or issue any such orders. Anyone who obtains an order as described below should bring a copy of the order to the Title IX Coordinator as discussed more in the information below.

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 provide assistance 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 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. If you obtain an order of protection, bring a copy of said order to Jereme Watson, Director of Students Services/Title IX Coordinator. He will work with you to create a safety plan to ensure your safety while on campus. This includes things like providing an escort around campus, issuing a special parking permit to allow parking in a variety of types of spaces, and even no trespassing the abuser from campus ground, if applicable. If the order is violated while you are on campus, call 911 to have an officer respond to campus.

Police are required to effect an arrest for a violation of a protective order. If the offender is also a student or employee at Urshan, additional conduct charges may be applied through Urshan's policies and procedures. Complaints of violations of protective orders involving students or employees may be made to the Title IX Coordinator, who will determine which policy has jurisdiction based on what has been reported, if applicable.

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 and Protective Measures Available for Victims

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Urshan will provide written notification to students and employees about accommodations available to them, including academic, living, transportation, protective orders and working situations. The written notification will include information regarding the accommodation options, available assistance in requesting accommodations, and how to request accommodations and protective measures (i.e., the notification will include the name and contact information for the individual or office that should be contacted to request the accommodations).

At the victim's request, and to the extent of the victim's cooperation and consent, institution offices will work cooperatively to assist the victim in obtaining accommodations. If reasonably available, a victim may be offered changes to academic, living, working, protective measures or transportation situations regardless of whether the victim chooses to report the crime to local law enforcement. Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall.

Possible changes to work situations may include changing working hours or locations. Possible changes in transportation may include having the student or employee park in a different location, assisting the student or employee with a safety escort, etc.

To request changes to academic, living, transportation and/or working situations or protective measures, a victim should contact Jereme Watson, Director of Student Services and Title IX Coordinator at studentservices@urshan.edu and/or title9@urshan.edu.

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 students and employees about existing assistance with and/or information about obtaining resources and services including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and assistance in notifying appropriate local law enforcement. 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 nd 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 https://bizellicounselinghelps.com/
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) https://bhrstl.com/
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 https://rainn.org/
St. Charles County Protective Orders (Orders of Protection)	11 th Judicial Circuit Court, 300 North 2 nd 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 https://www.dhs.gov/case-assistance
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		https://visahelp.us.com/
Financial Aid	MO Crime Victim's Compensation Program	https://dps.mo.gov/dir/programs/cvc/

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

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:
Kansas City Office Office for Civil Rights U.S. Department of Education One Petticoat Lane / 1010 Walnut Street, 3rd floor, Suite 320 Kansas City, MO 64106 Phone: 816-268-0550 Fax: 816-268-0599; TDD: 800-877-8339 Email: OCR.KansasCity@ed.gov	U.S. Department of Education Office for Civil Rights 400 Maryland Avenue, SW Washington, DC 20202-1100 Phone: 1-800-421-3481 Fax: 202-453-6012; TDD: 800-877-8339 Email: OCR@ed.gov

Confidentiality

Victims may request that directory information on file with the Institution be withheld by request to Jereme Watson, Director of Student Services and Title IX Coordinator, using the contact information found above.

Regardless of whether a victim has opted-out of allowing the Institution to share "directory information," personally identifiable information about the victim and other necessary parties will be treated as confidential and only shared with persons who have a specific need-to-know, i.e., those who are investigating/adjudicating the report or those involved in providing support services to the victim, including accommodations and protective measures. By only sharing personally identifiable information with individuals on a need-to-know basis, the institution will maintain as confidential, any accommodations or protective measures provided to the victim to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

The Institution does not publish the name of crime victims or other identifiable information regarding victims in the Daily Crime Log or in the annual crime statistics that are disclosed in compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*. Furthermore, if a Timely Warning Notice is issued on the basis of a report of domestic violence, dating violence, sexual assault or stalking, the name of the victim and other personally identifiable information about the victim will be withheld.

Adjudication of Violations

The institution's disciplinary process includes a prompt, fair, and impartial investigation and resolution process. In all instances, the process will be conducted

in a manner that is consistent with the institution's policy and that is transparent to the accuser and the accused. Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within 60 days of the report. However, each proceeding allows for extensions of timeframes for good cause with written notice to the accuser and the accused of the delay and the reason for the delay. Institution officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking as well as how to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. Furthermore, each policy provides that:

1. The accuser and the accused will have timely notice for meetings at which the accuser or accused, or both, may be present.
2. The accuser, the accused and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meetings and hearings;
3. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the accuser or the accused;
4. The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The accuser and the accused each have the opportunity to be advised by an advisor of their choice at any stage of the process and to be accompanied by that advisor to any related meeting or proceeding. The Institution will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding. However, the role of the advisor is limited to advice and support. The advisor may not act as a proxy for the party, disrupt any meeting or proceeding, or receive answers to questions other than general questions regarding the timeframes for the process or other procedural items;
5. The accuser and the accused will be notified simultaneously, in writing, of the any initial, interim and final decision of any disciplinary proceeding; and
6. Where an appeal is permitted under the applicable policy, the accuser and the accused will be notified simultaneously in writing of the procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding. When an appeal is filed, the accuser and the accused will be notified simultaneously in writing of any change to the result prior to the time that it becomes final as well as of the final result once the appeal is resolved. Whether or not criminal charges are filed, the institution or a person may file a complaint under the following: the institutions Sexual Misconduct and

Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees.

Disciplinary Procedures for Cases of Alleged Domestic Violence, Dating Violence, Sexual Assault and Stalking

The *Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees* has jurisdiction to respond, investigate and adjudicate all claims of sex-based harassment or discrimination, including allegations of being a victim of a VAWA crime. This is an institutional policy and not a replacement for the criminal justice process. The two processes are separate and distinct, and a person may engage in one process, both processes or neither process.

1. How to File a Disciplinary Complaint Under this Policy

Anyone can complain of an incident of sex-based harassment or discrimination or gender-based harm and ask that Urshan respond. This would include reporting sexual assault, dating violence, domestic violence and/or stalking. Reports should be made to:

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

2. How the Institution Determines Whether This Policy will be Used

Urshan has one policy and procedure that applies to all students and all employees. Consequently, when a claim of a VAWA offense is reported, the institution's *Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees* will apply.

3. Steps in the Disciplinary Process

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 interim measures or accommodations; discuss the options for reporting and give the Notice of Complainant's Rights.

As outlined above, 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. If informal resolution is an option, the Title IX Coordinator will present this as an option to the parties. The Title IX

Coordinator will not permit informal resolution to be utilized, even if both parties express the desire to utilize it, if the misconduct reported included any form of physical violence. (See the section on Informal Resolution for a complete description of this option.) If a third-party reports or when a complainant requests to remain confidential, the Title IX Coordinator will make a determination as to confidentiality balancing the wishes of the complainant with the factors previously listed.

If informal resolution is not an option and/or the Title IX Coordinator determines that the severity of the case does not allow for confidentiality, the Title IX Coordinator will assign the case to a trained investigator(s). Urshan reserves the right to outsource (i.e., hire an external investigator(s)) to conduct an investigation into any complaint in which they feel that the institution's interests (staffing, area of expertise, perceived bias) or the party's best interests (complainant or respondent) would be best served.

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 voicemail, text message, email and social media sites), photographs (including those stored on computers and smartphones), diagrams and medical records (subject to the consent of the applicable party).

Absent consent of the applicable party, medical and counseling records are privileged and confidential documents that students will never be required to disclose during the resolution of a report under this policy. However, a party may choose to share medical and counseling records as part of the investigation.

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 either of the parties is generally not relevant to the determination of a policy violation and will be considered only in 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 bearing on whether consent was sought and given during the incident in question. However, even in the context of a relationship, consent to one sexual act does not, by itself, constitute consent to another sexual act, and consent on one occasion does not, by itself, constitute consent on a subsequent occasion. In addition, prior sexual history may be relevant to explain the presence of a physical injury or to help resolve another question raised by the report. The investigator will determine the relevance of this information and both parties will be informed if evidence of prior sexual history is deemed relevant.

Prior or subsequent conduct of the respondent may be considered in determining pattern, knowledge, intent, motive, or absence of mistake. For example, evidence of a

pattern of sexual misconduct or other forms of prohibited conduct by the respondent may be deemed relevant to the determination of responsibility for the sexual misconduct or other forms of prohibited conduct under investigation. The determination of relevance of pattern evidence will be based on an assessment of whether the previous or subsequent conduct was substantially like the conduct under investigation or indicates a pattern of similar misconduct.

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, present evidence and/or witnesses.

The investigator will draft a Preliminary Report, summarizing the fact-finding related to the case. In general, the investigator may choose to not include information that is irrelevant, more prejudicial than probative, immaterial, personal opinion.

At the conclusion of the investigation, the investigator will deliver the report to the Title IX Coordinator, providing only the facts of the matter and not rendering any decision with regard to whether or not sexual misconduct or other forms of prohibited conduct occurred.

The Title IX Coordinator will review the investigator's report for competition or, if necessary, direct the investigator to conduct further investigation.

At the completion of the investigation, the Title IX Coordinator will provide written notice to both parties that the investigation is complete and arrange an opportunity for the parties to review the investigative report.

The complainant and respondent may offer in writing any additional comment or evidence to the Title IX Coordinator at this time, including questions each would like asked of the other party if not previously asked or collected by the investigator. Following receipt of any additional comment or evidence, the investigator will create a Final Report with associated evidence.

If the respondent is an employee, upon receipt of any additional information by the complainant and respondent, or no comments, the Title IX Coordinator will review the report and all related documents and additional comments from the parties. The Title IX Coordinator then will present the Executive Vice President (EVP) with the Final Report and associated evidence and the EVP will make a determination using the preponderance of the evidence of whether or not the respondent is responsible for a policy violation. This proceeding is not open to the public and neither the complainant, respondent nor are witnesses permitted to be present.

If the respondent is a student, upon receipt of any additional information by the

complainant and respondent, or no comments, the Title IX Coordinator will review the Final Report and associated evidence, and additional comments from the parties. The Title IX Coordinator then will convene a panel of three University employees (not to include the Title IX Coordinator), provide the panel with the report and associated evidence, and set a time for the parties to appear and the panel to convene. The panel and the parties (along with their advisors of choice) will convene at the scheduled location and time.

The parties may request to not sit in the same space and instead participate in the proceeding via Skype or other video conferencing application. One panel member will be selected by the panel to serve as the Chair and will ask any questions to the parties. The panel will review the report and associated evidence and offer the parties, through the party's advisor, to ask any questions they feel were not asked by the investigator and included in the report. Upon completion of the hearing, the panel will adjourn the proceeding at which time they will, in private, make a determination using the preponderance of the evidence of whether or not the respondent is responsible for a policy violation. This proceeding is not open to the public and neither the complainant, respondent nor are witnesses permitted to be present.

If the accused person is a student, the Title IX Coordinator will determine the sanction. If the accused person is a faculty or staff member, the Executive Vice President will determine the appropriate sanction.

The Title IX Coordinator will communicate decisions regarding responsibility and any sanction(s) to students. The Title IX Coordinator, together with the Executive Vice President, will communicate decisions regarding responsibility and any sanction(s) to faculty and staff members.

The outcome of the investigation, the rationale for the findings, and any sanction(s) imposed shall be simultaneously conveyed to the complainant and respondent in writing by email, U.S. Mail or face-to face by the Title IX Coordinator. (Private information may also be disclosed to appropriate personnel if deemed necessary by the Title IX Coordinator including, but not limited to a Department Chair, Athletics, Registrar, etc.).

The complainant and the respondent have the right to appeal determinations regarding responsibility. Appeals should be submitted to the Title IX Coordinator in writing within 5 business days of the notice of outcome. Appellate opportunity is equitable, that is both parties have the right to appeal. Appeals should be based on a procedural error or the discovery of new evidence that would substantially change the outcome (evidence that was not discovered during the fact-finding NOT evidence that was not shared and the party now wants shared) or sanction inconsistent with the findings.

The Title IX Coordinator will make a determination as to whether the appeal is timely and on appropriate grounds and will provide written notification to both parties. For

timely and appropriate appeals, the appeal will be reviewed by The Urshan Student Disciplinary Committee (minus the presence of a student representative) who may adjust the sanctions, return the case to the investigator or overturn a substantive procedural error that impacted the result.

4. Anticipated Timelines

It is anticipated that the investigation and resolution will not exceed 60 days. However, if the institution determines it will, then a written letter explaining the reason for the delay and the anticipated timeframe for completion will be provided to both the complainant and respondent.

5. Decision-Making Process

The adjudicator will weigh all evidence, including testimonial, documentary, and tangible, to determine if it is more likely than not that the act as alleged occurred. If the adjudicator believes that it is more likely than not, then the adjudicator will find the respondent "responsible" for a violation of institutional policy. If the adjudicator does not find it more likely than not to have occurred, then a finding of "not responsible" will be issued.

6. Standard of Evidence

The institution uses the evidentiary standard of preponderance of the evidence, which means they weigh evidence to determine if it is more likely than not that the act occurred.

7. Possible Sanctions

Student Sanctions for violations of the policy include the following:

- Warning: A written notice to the student, which shall remain in the student's file.
- Loss/Restriction of Privileges: Denial of specified Student Life privileges for a period of time.
- Discretionary Measures: Restorative justice practices which may include a referral to a counseling center, referral to a wellness program, accountability measures with a pastoral leader, or other measures deemed fitting by Title IX Coordinator, Hearing Panel, or Student Disciplinary Committee.
- Residence Hall Suspension: Separation of the student from the residence halls for a period of time, after which the student is eligible to return to the residence hall. Conditions for readmission may be specified.
- Residence Hall Expulsion: Permanent separation of the student from the residence halls.
- Suspension: Separation of the student from the institution for a definite period

of time, after which the student may be eligible to return. Conditions for readmission may be specified. Any student placed on a suspension will be restricted from attending any school-sponsored functions, both on and off-campus, while the suspension is active. Upon return to the institution after a suspension, the student will be considered on Probation/ Student Life Restriction for their first semester. Should violations continue during this probationary period, the student would be subject to immediate expulsion.

- Expulsion: Complete removal of the student from Urshan for an indefinite period of time.

Urshan employee sanctions for violations of this policy 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.

8. Range of Protective Measures Available to a Victim Alleging Misconduct

There are a range of protective measures the institution can put into place upon an allegation of sexual misconduct. These include things like no-contact provisions, no trespass directives, remote participation in meetings and proceedings, changes to class schedules, work locations, parking locations, personal safety escorts, and remote learning. The institution also takes acts of retaliation very seriously and will not tolerate retaliation against a party who is participating in or bringing forth a claim of harm due to a VAWA crime.

Institution-Initiated Protective Measures

In addition to those protective measures previously described, the Title IX Coordinator or their designee will determine whether interim interventions and protective measures should be implemented, and, if so, take steps to implement those protective measures as soon as possible. Examples of interim protective measures include but are not limited to: An Institution order of no contact, residence hall relocation, adjustment of course schedules, a leave of absence, or reassignment to a different supervisor or position. These remedies may be applied to one, both, or multiple parties involved. Violations of the Title IX Coordinator's directives and/or protective measures will constitute related violations that may lead to additional

disciplinary action. Protective measures imposed may be temporary pending the results of an investigation or may become permanent as determined by Urshan.

The institution will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. The institution must make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

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 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: 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.

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, Rachelle Holbrook, located in the Durr Administration Building (A; Room 417), by calling 314-838-8858 ext. 2117, or emailing rhobrook@urshan.edu; or to any designated Campus Security Authority (CSA).

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

Urshan is committed to preventing hazing and educating the campus community about its risks and consequences. While new Campus Security and the Clery Coordinator personnel began operations in mid-2025, we are actively working to develop comprehensive training, prevention programs, and awareness initiatives. Current efforts include exploring relevant workshops and courses through our contracted training platform, VectorSolutions. As these programs are implemented, Urshan will continue to update the university community and maintain accurate information on the university's website in accordance with the SCHA.

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 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 ³	0	0	N/A	N/A	N/A	N/A	\$0

³ 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

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

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>