

# COMBINED ANNUAL REPORT

## Campus Security and Fire Safety

Florida and Illinois

BALANCE

SCIENCE

NATURE

October 1, 2018



National  
University  
Of Health Sciences

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**NOTE:**

Pursuant to the *Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act* (20 U.S.C. § 1092(f)), NUHS published and distributed its **Annual Campus Security and Fire Safety Report** prior to October 1, 2018. Subsequent to complying with the October 1 deadline, but prior to the October 17, 2018 federal deadline for finalizing and “locking” the institution’s crime statistics, corrections were made to the classification & counting of the following offenses: aggravated assault, burglary, liquor law, drug, & weapons violations (Main Campus) to comply with the stipulations set forth in the DOE publication, *“The Handbook for Campus Safety and Security Reporting – 2016 Edition.”* NUHS wishes to make clear: the final, “locked” statistics submitted to DOE are unaltered and accurate. This notice seeks to inform the public & NUHS constituents that the Annual Security Report (submitted & distributed prior to Oct. 1<sup>st</sup>) has been rescinded, updated & re-distributed.



## ANNUAL CAMPUS SECURITY and FIRE SAFETY REPORT

October 1, 2018

### Purpose

The purpose of this publication is to:

- Provide the NUHS Community with an overview of campus security, support services, emergency response and evacuation procedures, and publicize the NUHS policies governing missing student notification and misconduct related to drugs and alcohol, weapons possession, sexual assault and sexual harassment.
- Share campus crime and fire safety statistics as required by the Jeanne Clery Disclosure of Campus Security Policy, the Violence Against Women Act and Campus Crime Statistics Act.
- Share information in this annual report with current University students, faculty and staff as well as prospective students and employees.

The policies and procedures contained within this document are subject to change at any time. A hard copy of this document may be obtained by contacting the Vice President for Administrative Services at (630) 889-6607, or submit a request to [tmchugh@nuhs.edu](mailto:tmchugh@nuhs.edu) for an email copy of the report. The University also reports the annual crime statistics contained in this report to the U.S. Department of Education. A searchable database containing those statistics can be found at <https://ope.ed.gov/campussafety/#/>. (To view the 2015 crime statistics for the National University of Health Sciences sites in Lombard, Illinois and Pinellas Park, Florida please refer to Appendix A at the end of this document).

The University prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (20 U.S.C. § 1092(f)). This report is prepared in cooperation with the local law enforcement agencies adjacent to our two campuses. When referrals are made to outside agencies that provide counseling or psychological support service to crime victims, the University has not arranged nor requested the staff members at the agency to inform the referred client of the procedures to report crime to NUHS Security Officers on a voluntary or confidential basis, should they feel it is in the best interest of the client. A procedure is in place, however, to encourage confidential reporting to the Vice President for Administrative Services or the Student Services Office by ensuring anonymity of the reporter. This process fosters a genuine picture of campus crime by allowing victims or witnesses to report violations promptly, thereby producing an accurate count of crime statistics to be disclosed in the annual update of crimes reported to the Department of Education.

Each year, an e-mail notification is sent to all students and employees providing the address on the University's web site to access this report. Copies of the report may also be obtained at the Student Services Office on the 2nd floor of Janse Hall on the Illinois site (630) 889-6542 and at the Student Services Office in the HEC Annex on the Florida site (727) 803-6121 as well as the Dean of Professional Studies Office on the Seminole site. In Illinois, copies may also be obtained from Human Resources on the 1st floor of Janse Hall or by calling (630) 889-6878 during business hours.

### Reporting a Crime or Other Emergency On-Campus

**IF YOU ARE A VICTIM OF A CRIME OR A WITNESS TO ONE, OR IF YOU NEED TO REPORT A FIRE, MEDICAL, OR OTHER EMERGENCY, IN ILLINOIS OR FLORIDA:**

**DIAL 911**

Criminal activity that represents a threat to students, employees, or campus visitors should be reported to NUHS Security or SPC Security immediately so that the University may issue a warning to the community.

In a non-emergency situation, you should report suspicious people or activities, traffic accidents, or potential violations of law to the police agency serving the location where the activity occurs:

#### Campus Security Phones

- Illinois-on-campus phone: Ext. 311
- Illinois-Campus Security: (630) 927-9957

- SPC Security Dispatch: (727) 791-2560

Campus Security is the central reporting authority for all crimes occurring on the Illinois or Florida campuses. The Office of Campus Security, Title IX Coordinator or Officials and/or the Student Services Office will conduct investigations on-campus and work closely with local authorities. Any crime reported to the Campus Security Department that is in violation of Criminal Law and Procedures in the State of Illinois may be reported to the Lombard Police Department for further investigation. In Florida, crime should be reported to the Pinellas Park or St. Petersburg Police Department.

The Dean of Students, Director of Facilities & Security, Title IX Coordinator or their designee will provide timely notification to the NUHS community (students, faculty and staff) regarding possibly dangerous conditions or crimes that are reported to the Campus Security Department. Methods of notification include NUHS community mailboxes, University monitors, bulletin boards, text messaging, voice or email, telephone trees, and/or memo delivery to the student housing rooms.

Because speed and accuracy predominate the decision-making process related to any timely warning system, the Dean of Students, Title IX Coordinator and the Director of Facilities & Security have generally deferred to the Director of College-wide Security Services regarding issuance of a "Timely Warning" for the NUHS campus in Florida.

When violent crimes (especially sexual violence) are reported to the Campus Security Department, the following campus support personnel will be contacted in order to assist the alleged victim(s):

- Title IX Coordinator - (630) 889-6607
- Will be contacted by Campus Security, (630) 927-9957, when a victim reports an assault
- Director of Facilities & Security- (630) 889-6638
- Student Services Office - (630) 889-6542
- Dean of Clinics - (630) 889-6513
- Coordinator of Housing - (630) 889-6661

After 5:00 p.m. (CST) this notification is made through the Campus Security Dispatch Center. As stated above, if a report involves violation of the law then local, county or state authorities will be notified of the crime.

In Illinois:

- Lombard Police Department - (630) 873-4400
- Lombard Fire Department - (630) 620-5738
- Illinois State Police (District 5) - 815-726-6377

In Florida:

- Pinellas Park Police Department – (727) 369-7864
- St. Petersburg Police Department - (727) 893-7780
- Pinellas County Sheriff - (727) 582-6200

NUHS does not own, operate or control (in a manner described by the [U.S. DOE Handbook for Campus Safety and Security Reporting](#)) any off-campus housing or off-campus student organization facilities.

## **Confidential Reporting: For Victims and Witnesses**

If you are the victim or witness to a crime of a sexual nature and do not want to pursue action within the University System or the criminal justice system, you may still want to consider making a confidential report to the Title IX Coordinator, Title IX Official, Student Services Office or Illinois Confidential Advisor. With your permission, the above mentioned personnel can file a report on the details of the incident without revealing your identity. The purpose of a confidential report is to maintain anonymity, yet it allows NUHS Security to take steps to ensure your future safety and that of others. With such information, the University can keep an accurate record of the number of incidents involving students, employees and visitors and alert the campus community to potential danger if necessary. Confidential reports actually create a safer overall environment by revealing an accurate picture of the safety or danger in an area on campus. When victims are able to file a confidential or anonymous report, violations are promptly and accurately disclosed to the community through timely warnings and the institution's annual report of crime and fire statistics.

## **Timely Warning System**

In the event that a situation arises, either on or off campus, that, in the judgment of the Title IX Coordinator, Dean of Students or the Director of Facilities & Security, constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The warning will be issued using hardcopy flyers, through the university e-mail system to students and employees, the campus' electronic monitor system, and the University's text-messaging system known as e2Campus.

Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, the Title IX Coordinator, Dean of Students or the Director of Facilities & Security may also post a notice on the University web site at: <http://www.nuhs.edu/>, providing the University community with more immediate notification. In such instances, a copy of the notice is posted in each student housing structure and at the front door of each on-campus building. The web site is immediately accessible via computer by all employees and students. Anyone with information warranting a timely warning should report the circumstances to the University Security office, by cell phone at (630) 927-9957, the Title IX Coordinator at (630) 889-6607 or the Students Services Office at (630) 889-6542 or in person at the Student Services Office on the 2nd floor of Janse Hall in Illinois or the Student Services Office on the first floor of the Annex in Florida. Because speed and accuracy predominate the decision-making process related to any timely warning system, the Dean of Students, Title IX Coordinator and the Director of Facilities & Security have generally deferred to the Director of College-wide Security Services regarding issuance of a "Timely Warning" for the NUHS campus in Florida. The Director works with the college's general counsel office to initiate action for a "Timely Warning" to the community once it has been determined that a "threat" to the community exists. This can occur any day of the week, or time of the day. The Director, in concert with the General Counsel's office, will draft the appropriate notice to the college community and post the notice on all (affected) college sites. The Timely Warning may be distributed by poster and memo, e-mail, web site or the college's emergency notification system, e2Campus.

## **NUHS Campus Security**

Trained security officers patrol the Illinois and Florida NUHS campus grounds and parking lots 7 days a week/24 hours a day. Although the security officers are not certified police officers, they do work closely with local authorities. The officers provide an important service to our campuses through active patrol, observation and intervention. Senior Security Supervisors and Senior Officers perform security assessments and inspections, conduct interviews, complete incident reports and notify the local police authority when necessary. Security officers in Florida report to St. Petersburg College's Security Department. Security officers in Illinois report to the NUHS Director of Facilities & Security.

## **Missing Student Notification Policy**

In compliance with (20 USC 1092 (j) Section 488) of the Higher Education Opportunity Act of 2008, the University has established a [Missing Student Notification Policy](#) that describes the formal notification procedures to be followed when a student residing in on-campus housing has been reported missing for more than 24 hours.

At the time of renewing the on-campus housing license agreements each semester, all students are requested to provide the Housing Office with the name and contact information of a person who resides locally (classmate, friend, significant other, etc.) who may be able to quickly assist in an investigation to determine your whereabouts in the event that you are reported missing after 24 hours. This person will serve as a confidential, emergency contact only to be sought out if you are reported to be missing from student housing after 24 hours. This information is maintained in a Personal Emergency Contact System in the Housing Office and is designated as confidential. Only authorized campus officials, including the Coordinator of Housing, the Director of Facilities & Security, Dean of Students, University Registrar, and the officers in the NUHS Security Department, are provided this information in the furtherance of the missing student investigation. Incidents of missing students at the University should be reported immediately to the NUHS Security Department. Upon receipt of a report of a missing student who resides in on-campus housing, the Director of Facilities & Security or the Dean of Students or their designee shall initiate an investigation. If a determination is made that a student has been missing for more than 24 hours and has not returned to campus, the Director of Facilities & Security or the Dean of Students or his/her designee will contact the person(s) the student designated in the Personal Emergency Contact System. If the missing student is under 18 years of age and not emancipated, the student's custodial parent or legal guardian is contacted. NUHS actively investigates all reports of missing students. The investigation is conducted pursuant to established policies and procedures of the NUHS Security Department.

## **Security Awareness Programs**

The NUHS community offers numerous advantages to students and residents. The community offers a safe and secure learning environment. However, it is not immune to the kinds of problems that occur in the rest of society. Unfortunately, the potential for criminal activity to occur at NUHS (both Illinois and Florida sites) is a reality that must be taken seriously. The University strives to provide a safe and secure environment for students, employees and visitors. However, it is only possible to maintain safety and security when every

student and employee plays an active role in the effort. Regardless of how effective the University's programs may be, a vital development that must occur within each person is the moment when everyone understands and accepts a personal sense of responsibility for the collective safety of the community. No security department or set of procedures can be effective unless individuals exercise reasonable care and prudence. Safety and security is everyone's responsibility.

During orientation every trimester, new students are informed of services offered by the Office of Student Services and the Campus Security Department. Students are advised about crime on-campus. NUHS campus officials pursue crime reduction by offering sexual assault and personal safety seminars aimed at risk avoidance and crime prevention. These seminars are offered occasionally within the year by on-campus martial arts clubs and are open to any student or employee. The Office of Student Services also publishes and distributes the University policies regarding crimes of violence and sexual harassment, victims' rights and victim support services within this Combined Report, the University Bulletin, the Student Handbook and the NUHS Title IX and Sex Discrimination Policy.

### **Safety In Residence Halls and Campus Buildings**

The university provides an effective structure for the protection of students in residence halls. The elements of this system include:

- Security personnel.
- Door peepholes.
- Locked entrance doors.
- Information about steps students can take to maintain their safety.

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and how that affects the security of others on campus. Security information is disseminated to students and employees through security alert posters and occasional e-mails. When time is of the essence, information is released to the University community through security alerts posted through voice-mail, e-mail, text messaging, University monitors, and the University website.

### **Prevention Efforts**

NUHS attempts to foster a safe living, learning, and working environment for all members of the campus community. To accomplish this, NUHS considers the educational programming that addresses all aspects of domestic violence, dating violence, sexual assault, and stalking (safety precautions and prevention, crisis management, reporting, medical and counseling services, the NUHS discipline systems, academic schedules, living arrangement, etc.), the campus response to sexual violence, domestic violence, dating violence, and instances of stalking, and physical surroundings throughout the campus community. The University educates the student community about sexual assaults and date rape through orientations each term. Local Police Departments offers sexual assault education and information programs to University students and employees upon request. Literature on date rape education, risk reduction, and University response is available through the Office of Student Services.

NUHS offers educational programs concerning domestic violence, dating violence, sexual assault, and stalking. Involved students, faculty, staff, and community members provide information and promote discussion on interpersonal abuse and violence issues. For additional information about campus educational programs concerning domestic violence, dating violence, sexual assault, or stalking, contact the Title IX coordinator, the Housing Office, Human Resources, or the Student Services Office.

The University continually reviews and modifies its physical surroundings to enhance security and safety, such as campus lighting, locking procedures, signage, etc. For additional safety information, contact Mark Galvononi, the Director of Facilities & Security at (630) 889-6638.

### **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. 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. If you or someone else is in immediate danger, dial 9-1-1. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

- 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.

- Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
- Speak up when someone discusses plans to take advantage of another person.
- Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
- Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

\*Bystander intervention strategies adapted from *Stanford University*

### Risk Reduction Tips

With no intent to victim blame and recognizing that only rapists are responsible for rape, the following are some strategies to reduce one's risk of sexual assault or harassment.

- **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.
- Try to **avoid isolated areas**. It is more difficult to get help if no one is around.
- **Walk with purpose**. Even if you don't know where you are going, act like you do.
- **Trust your instincts**. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- **Try not to load yourself down** with packages or bags as this can make you appear more vulnerable.
- **Make sure your cell phone is with you** and charged and that you have cab money.
- **Don't allow yourself to be isolated** with someone you don't trust or someone you don't know.
- **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.
- **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.
- **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 9-1-1 in most areas of the U.S.).
- **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, get a new one.
- **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.
- **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.
- **If you suspect you or a friend has been drugged, contact law enforcement immediately (local authorities can be reached by calling 9-1-1 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).

If you need to get out of an uncomfortable or scary situation, here are some things that you can try:

- **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.
- **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.
- **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.
- **Lie**. If you don't want to hurt the person's feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
- **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?
- 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.

## Emergency Response and Evacuation Procedures

The University is dedicated to providing a safe and secure environment for students, faculty, staff, visitors and guests. NUHS maintains comprehensive information about the University's general emergency management process on its website at <https://www.nuhs.edu/student-services/campus-life/campus-security/>.

NUHS Administrators have established the Emergency Operations Plan (EOP), which describes the University's emergency management organization, policies and response guidelines. The EOP is based on the guidance provided by the National Incident Management System (NIMS). The plan sets forth a systematic approach for managing emergencies that threaten the health and safety of the campus community or disrupt its programs or activities.

The NUHS Director of Facilities & Security or his designee (acting through the Vice President for Business Services as delegated by the President) serves as the Emergency Management Coordinator and is responsible for directing the emergency management efforts. The EOP identifies other departments, units, and individuals responsible for providing emergency response and critical support services, and describes their respective roles and responsibilities.

The EOP describes the process NUHS will use to confirm that there is a significant emergency. The Emergency Management Coordinator assesses the danger and potential threat the event may pose to the safety of the campus community, and determines the appropriate course of action in light of the specific circumstances. In the event of an emergency, the Coordinator, without delay and taking into account the safety of the campus community, determines whom to notify, determines the content of the notification, and initiates the notification system, unless it is determined that the notification will compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

As outlined on the NUHS website, the University has a variety of ways of disseminating emergency information to the larger community, including the following:

- Public Media
  - Local radio and television stations are notified of any disasters or emergencies occurring on the University campus.
  - The VP for Business Services coordinates connections with all major media outlets to provide emergency notifications.
- Mass Calling and Notification
  - The Student and Employee Alert System ([e2Campus](#)) allows authorized personnel to send a recorded voice message, e-mail, and text message simultaneously from a remote site. The messages contain important information about the emergency and are recorded upon the EM Coordinator learning of the event. To receive the messages, individuals may provide phone numbers and e-mail addresses to the e2Campus Alert System by visiting <http://www.nuhs.edu/student-services/web-services/e2campus/> and logging in. When the system is activated, one or more of the following alerts are sent depending on the contact information the recipient has provided.
    - Voice Call
      - Individuals who have provided their phone numbers are called and a prerecorded voice message is played.
    - E-Mail
      - An e-mail about a disaster or emergency is sent to all individuals who have provided e-mail addresses. The message is sent from "[no-reply@e2campus.com](mailto:no-reply@e2campus.com)."
    - SMS Text Message
      - Individuals who have provided cell phone numbers are sent a text message about the alert.
- Warning Sirens
  - Warning sirens are strategically placed adjacent to the NUHS campus (Lombard Fire Dept.) to sound in the event of a tornado warning. The sirens are tested on the first Tuesday of every month at 10:00 AM.
- Building Evacuation Alarms
  - Every campus building has an evacuation alarm.
- NUHS Web Site
  - The EM Coordinator can activate a web site with pertinent information and instructions in the event of a disaster or emergency.
- E-mail Transmission

- A mass e-mail may be sent to the campus community with pertinent disaster information or instructions.

### **Emergency Response and Evacuation Testing Procedures**

The University has Emergency Action Teams and plans for each building on campus. Each team receives basic training on how to implement the evacuation and sheltering plans for its building.

Evacuation and sheltering drills are conducted annually in academic buildings in or near the month of May. The residential halls conduct a minimum of two (2) evacuation and sheltering drills between the months of September and April each year. All drills are announced in advance to allow for the safety of those involved. All members of the university community and local responders receive a minimum of 48 hour notice. Tests and drills are performed on the following frequency: Life-saving apparatus (sprinklers and detectors) are tested annually. Extinguishers and emergency lights are inspected monthly by campus security and serviced annually by sub-contractors. Fire drills are performed bi-annually in residential buildings and annually in academic buildings.

Staff and faculty are in possession of the crisis manual for evacuation procedures. Annual drills and tests are preceded by electronic notification of the day, time and type of drill. Department meetings will occur to answer general questions prior to the event occurring. NUHS has built a partnership with local Police and Fire responders to work with our university community to aid us in pre and post active response scenarios / events. NUHS has hosted building tours with Fire Department personnel during in-between trimester periods on our campus. The most recent event was completed in July 2017.

The Vice President for Business Services and Director of Facilities & Security maintain records of all tests and drills (including notifications) on campus for review. These records are available by request from the NUHS Director of Facilities & Security.

### **Drug and Alcohol Policy**

The abuse of alcohol and the illicit use of other drugs can seriously threaten the health and safety of students, employees, their families, fellow students, and the general public, as well as adversely impair performance. In addition to promoting health, safety and a positive learning and working environment, the University is committed to reducing and preventing alcohol and other drug-related problems among all members of the campus community.

The unlawful possession, use or distribution of alcohol or other drugs by anyone, either on our institution's property or as any part of University sponsored activities, is prohibited. Underage possession and/or consumption of alcoholic beverages is a violation of regulations and state law. The furnishing of alcohol to those less than 21 years of age is prohibited. Any person who is determined to have violated this policy will be subject to intervention by NUHS. That intervention may include disciplinary action up to and including expulsion, termination of employment and/or referral for prosecution.

#### **NUHS Drug and Alcohol Abuse Prevention Policy**

The Higher Education Act of 1965 (as amended by the Safe and Drug-Free Schools and Communities Act of 1994 and the Drug-Free Workplace Act of 1988) requires any institution of higher education, as a condition of receiving funds or any other form of financial assistance under any federal program, to certify that it has adopted and implemented a drug prevention program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. The Department of Education's regulations, at 34 C.F.R. Part 86, require that NUHS, as part of its drug & alcohol abuse prevention program for students and employees, annually distributes (in a manner consistent with federal guidelines) the following information:

1. Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;
2. A description of the applicable legal sanctions under state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol;
3. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
4. A description of available drug and alcohol counseling, treatment, rehabilitation, or re-entry programs; and
5. A clear statement of the disciplinary sanctions that the University will impose on students or employees who violate these standards of conduct.

The University will conduct a biennial review of its drug prevention program to determine its effectiveness, implement changes as needed, and ensure that the disciplinary sanctions are consistently enforced. The National University of Health Sciences fully supports the objectives of these laws and their related regulations. The University recognizes both alcohol and drug abuse as potential health, safety, and security problems. The

University expects its students and employees to cooperate in maintaining a University environment free from the effects of alcohol and other drugs and to comply with this policy.

### **Standards of Conduct: Students and Employees**

NUHS is an institution committed to promoting the physical, intellectual, social, ethical, and spiritual development of all its members. The abuse of alcohol and the illicit use of other drugs can seriously threaten the health and safety of students, employees, their families, fellow students, and the general public. In addition to promoting health, safety and a positive learning and working environment, the National University of Health Sciences is committed to reducing and preventing alcohol and other drug-related problems among all members of the campus community.

The unlawful possession, use, or distribution of alcohol or other drugs by anyone, either on our institution's property or as any part of University sponsored activities, is prohibited. Any person who is determined to violate this policy will be subject to intervention by NUHS. That intervention may include disciplinary action up to and including expulsion, or termination of employment and/or referral for prosecution, for violations of the standards of conduct.

As a condition of employment, an employee of NUHS must notify his/her supervisor if he or she has been convicted of an alcohol and/or other drug-related offense involving the workplace within five (5) days of the conviction. In the event that any such conviction involves an employee working on a federal contract or grant, the University is required to notify the granting or contracting Federal agency within ten (10) days of receiving notice of the conviction.

This policy and its requirements are consistent with NUHS' desire to promote campus community health and safety and are in accordance with the requirements of the Drug-Free Workplace Act of 1988 and the Safe and Drug-Free Schools and Communities Act of 1994. NUHS will continue its efforts to maintain an environment free from the unlawful possession, use, and distribution of alcohol and other drugs by adhering to this policy and by providing ongoing health promotion, risk reduction, intervention, and referral services for treatment and aftercare programs. A copy of the NUHS Drug & Alcohol Abuse Prevention Policy shall be distributed annually to all students and employees of the National University of Health Sciences.

### **Legal Sanctions**

Various federal and state laws prohibit the possession, distribution, and use of controlled substances, with the exceptions set forth within licensing requirements or a physician's prescription. Moreover, Illinois and Florida law prohibits the consumption and possession of alcohol by persons under the age of 21 and the supplying of alcohol to any person under the age of 21. Additionally, Illinois law prohibits the sale of alcoholic beverages except by those licensed to sell such beverages. Laws in Illinois and Florida together with city ordinances in both states also prohibit public intoxication, the operation of a vehicle or bicycle under the influence of alcohol or other intoxicants, and the consumption of alcohol in a public place. Violation of these laws or other laws relating to drugs and alcohol may result in probation, fines, imprisonment, and a permanent criminal record. Violation of drug laws may also result in civil seizure and forfeiture of property used in connection with the offense. A conviction may also result in University disciplinary action. Additional information can be found in the NUHS Drug & Alcohol Abuse Prevention Policy.

### **Counseling, Treatment, and Referral**

Students and employees who believe they may have an alcohol or drug problem are strongly encouraged to seek assistance through resources available at the University. Employees may contact the Director of Human Resources. The Director of Human Resources will connect employees with a local agency experienced at helping individuals on an outpatient basis.

Students should seek help through the Office of Student Services. Such contacts will be kept confidential, except as required by law or by concern for the immediate health, safety, or security of the individual or others. Referrals by the Director of Human Resources (employees) or Student Services personnel (students) can be made to publically funded mental health professionals (e.g., psychologists, social workers, psychiatrists) who are available to discuss an employee or student's concerns regarding drug or alcohol use in their life or in the life of someone close to them. Seeking professional assessment can frequently bring new perspective. Individuals requiring inpatient detoxification and/or rehabilitative services can be referred to institutions and hospitals in the local community that specialize in these types of services. The costs of such treatment and referrals may be covered in whole or in part by the individual's health insurance.

The University has the right to take any necessary action to protect the health, safety, and security of the affected individual and other members of the University community, including deciding whether, when, and

under what conditions a student may be reinstated or any employee may be returned to employment after an instance of alcohol abuse or improper drug use. Students with questions about the University alcohol and other drug policy, or any other University policy or rule, should contact the Student Services Office (630) 889-6542. Employees should contact the Human Resources (630) 889-6878.

**Drug and Alcohol Abuse: Education and Recovery Programs**

Listed below are links to a variety of self-help education programs for people trying to recover from alcoholism, drug addiction, and compulsive gambling. These programs are not formally affiliated with nor specifically endorsed by NUHS. Each, however, has been shown to be helpful for certain types of people seeking help. As noted, some of these programs have online meetings available.

<u>ILLINOIS RESOURCES</u>	<u>FLORIDA RESOURCES</u>
<u>Alcoholics Anonymous</u>	
<a href="http://www.chicagoaa.org">http://www.chicagoaa.org</a>	<a href="http://www.aapinellas.org">www.aapinellas.org</a>
<a href="http://aa-intergroup.org/">http://aa-intergroup.org/</a>	
<u>SMART Recovery</u>	
<a href="http://www.smartrecovery.org/">http://www.smartrecovery.org/</a>	<a href="http://www.smartrecovery.org/">http://www.smartrecovery.org/</a>
<u>Marijuana Anonymous</u>	
<a href="http://www.ma-online.org/redesign/index.php">http://www.ma-online.org/redesign/index.php</a>	<a href="http://www.ma-online.org/redesign/index.php">http://www.ma-online.org/redesign/index.php</a>
<u>Alanon</u>	
<a href="http://www.niafg.org/">http://www.niafg.org/</a>	<a href="http://www.al-anon.alateen.org">www.al-anon.alateen.org</a>
<a href="http://www.ola-is.org/">http://www.ola-is.org/</a>	<a href="http://www.al-anon-pinellas.org/">www.al-anon-pinellas.org/</a>
<u>Cocaine Anonymous</u>	
<a href="http://www.illinoisca.org/">http://www.illinoisca.org/</a>	<a href="http://www.ca-online.org/">http://www.ca-online.org/</a>
<a href="http://www.ca-online.org/">http://www.ca-online.org/</a>	<a href="http://www.fl-ca.org">www.fl-ca.org</a>
	<a href="http://www.usrecovery.info/ca/florida.htm">www.usrecovery.info/ca/florida.htm</a>
<u>Adult Children of Alcoholics</u>	
<a href="http://www.adultchildren.org/">http://www.adultchildren.org/</a>	<a href="http://www.allone.com/12/aca">www.allone.com/12/aca</a>
<a href="http://allone.com/12/aca/">http://allone.com/12/aca/</a>	
<u>Narcotics Anonymous</u>	
<a href="http://www.chicagona.org/">http://www.chicagona.org/</a>	<a href="http://www.bascna.org">www.bascna.org</a>

**Sexual Assault and Violence: Prevention, Policy Statements, Resources and Responses to Domestic & Dating Violence, Sexual Assault, and Stalking**

NUHS prohibits domestic violence, dating violence, sexual assault, and stalking, or other forms of sexual misconduct. Offenders may be subject to appropriate campus adjudication processes, disciplinary action, and/or criminal proceedings. NUHS manages a complaint of sexual misconduct as a form of sexual discrimination. NUHS employs procedures that provide prompt, fair, and impartial investigation and resolution in cases involving domestic violence, dating violence, sexual assault, and stalking. Trained and experienced university officials administer to these policies and procedures.

NUHS is striving to elevate awareness to the vital support services that are needed and available to students, faculty, and staff who experience sexual violence, domestic violence, dating violence, and instances of stalking. In these situations, NUHS is committed to providing crisis intervention measures for students, faculty, and staff, as well as appropriate administrative response for the complainant and respondent; referring individuals to criminal authorities; and educating and promoting discussion on interpersonal abuse and violence issues. The University's process does not preclude adjudication under state law.

NUHS prohibits retaliation by its officers, employees, students, or agents against a person who exercises his or her rights or responsibilities under any provision of federal or state law, including **Title IX** and the **Violence Against Women Act (VAWA)**, which imposes new obligations on colleges and universities under its **Campus Sexual Violence Act ("SaVE")** provisions, Section 304.

### **Actions & Options: Responding to Sexual Assault, Stalking, and Dating or Domestic Violence**

You have the right to decide who can touch you in a sexual way. While that may seem obvious, situations can arise that make that seem less clear. You have the right to say "no" to anything that makes you uncomfortable no matter who does it or in what situation it takes place. A violation of that is not your fault.

A sexual assault, whether by a stranger or an acquaintance, can be very frightening and disorienting. The same can be said if you've been victimized by dating or domestic violence and stalking. It happens to all people regardless of sexual orientation or sexual identification. Survivors of sexual assault are often confused about what they should do next, and many have questions whether what happened was really rape at all, especially if the assailant was someone they knew or with whom they've had a relationship. Survivors of sexual assault are also often frightened to call or tell someone else because they worry that they will not be believed or because they are ashamed or feel responsible. If you have been sexually assaulted or raped it is important to remember that it is not your fault and that you have the right to receive assistance from people who will believe you and help you in your recovery.

#### ***If the Assault Happened in the Last 72 Hours...***

- Get to a safe place. If you can, think of this: Assault may leave you feeling helpless, with no sense of control or any awareness of important options you have – whether you use them now or not, ***you do have options.***
- Call a friend, a campus advocate, a family member or someone else you trust to stay with you.
- To minimize harm to your body, please go to a hospital emergency room. Even if you don't have visible injuries, you should still have a medical examination and discuss with a health care provider the risk of exposure to sexually transmitted infections and the possibility of pregnancy resulting from the sexual assault. ***You will NOT be required to report the sexual assault or pay for your treatment (even if you have insurance) in order to receive medical care at an emergency room. It's been a Federal law since 1986.***
- Medical advocacy resources will provide someone to accompany you to the hospital, help you through the medical exam, or give you more information. A good campus resource is the Title IX Coordinator, Tracy McHugh, whom you can reach directly at (630) 889-6607 or through Illinois NUHS Security by dialing 311 from a campus phone or by calling (630) 927-9957 after regular business hours or Florida Security by dialing 2560 from a campus phone or by calling (727) 791-2560 after regular business hours. At the hospital, you may also ask for a *Sexual Assault Survivor Advocate* who is not affiliated with the University. You may also request more than a medical exam. There's a specific exam, a **SAVE** exam (Sexual Assault Victim's Exam), performed specifically to collect evidence for a criminal investigation.
- While your first impulse after an assault may be to bathe, this destroys evidence that will be important if you decide to press charges even at a much later date. **Please avoid showering, bathing, douching, changing clothes, or brushing your teeth. If you do want to change clothes, save all of the clothing you were wearing at the time of the assault. Place each item of clothing in a separate paper bag. Do not use plastic bags.** If you arrive at the hospital in the clothes you were wearing at the time of the assault, they will keep those clothes and give you something else to wear. Try to avoid disturbing anything in the area where the assault occurred.
- If you want to report the assault, notify the police (IL or FL) by calling 911.
- If you suspect that you may have been given a "date rape" drug, get to a hospital immediately and ask the doctor or nurse to take a urine sample, which will be preserved as evidence. **Rape drugs can only be detected for a limited time and are more likely to be detected in urine than in blood.**
- Write down or audio-record as much as you can remember about the circumstances of the assault, including a description of the assailant. This may be difficult, but it will be very helpful in getting proper medical attention and, if you want, in filing a complaint within the [\*\*\*Title IX and Sex\*\*\*](#)

[Discrimination Policy](#) or the NUHS *Code of Conduct* system, and/or taking legal action through the criminal justice system outside the University.

- Talk with a counselor, who is trained to help rape survivors deal with the emotional and physical impact of assault.
- You have the right to refuse any part of the hospital treatment. No examination can proceed without your explicit permission. You also have the right to information about the treatment and the right to ask any questions you want during treatment. Also, if you are not able to pay, you have the right to **free emergency medical treatment** following your assault.

### ***If The Assault Happened More Than 72 Hours Ago...***

There are still resources that can help you even if the assault occurred a long time ago. Even if it's been months or years since the assault, it is important to take care of yourself physically and psychologically. This may mean pursuing counseling or talking to someone you trust: a doctor, spiritual leader, friend, family member or anyone else whom you trust. Trying not to talk about the assault may make the process more difficult. If you would rather talk to someone who is not already a part of your life, there are many counseling resources available on and off campus that can help you, even long after the assault. It may not be too late to pursue legal action through the criminal justice system or action within the [Title IX and Sex Discrimination Policy](#) or the *NUHS Code of Conduct* system, if you so desire.

### **Immediate Assistance 24/7 for Victims of Sexual Assault & Violence**

- **Police** (NUHS Illinois or Florida campus) – 911
- **NUHS-Illinois Security:** (630) 927-9957.
- **Illinois Sexual Assault/Rape Crisis** – Coalition Against Sexual Assault: (217) 753-4117.
- **NUHS-Florida Security** – Campus - (727) 791-2560.
- **Florida Sexual Assault/Rape Crisis** – Florida Council Against Sexual Violence: (850) 297-2000.
- **Title IX Coordinator:**  
The Title IX Coordinator is Tracy McHugh, Vice President for Administrative Services. Her phone number is (630) 889-6607, after hours she can be reached through the University Security Officer on duty at (630) 927-9957. The Title IX Coordinator is available to answer any general or personal questions related to sexual assault. Callers, who use the Title IX Coordinator, do not have to provide their name.
- **National Sexual Assault Hotline:** 1-800-656-HOPE. <http://www.rainn.org>  
The Rape, Abuse and Incest National Network (RAINN) is the nation's largest anti-sexual assault organization. RAINN operates the National Sexual Assault Hotline and carries out programs to prevent sexual assault, help victims and ensure that rapists are brought to justice.

During business hours (8:30 a.m. to 5:00 p.m., Monday through Friday CST), you are strongly urged to contact the following as soon as reasonably possible to report any sexual misconduct you believe may have occurred:

Tracy McHugh, Title IX Coordinator (Illinois & Florida)	
(630) 889-6607 <a href="mailto:tmchugh@nuhs.edu">tmchugh@nuhs.edu</a>	Janse Hall, 1st Floor
Ms. Pam Jones, Title IX Deputy Coordinator (Florida)	
(727) 394-6217 <a href="mailto:pjones@nuhs.edu">pjones@nuhs.edu</a>	UPC, SPC 1st Floor
Ms. Yesenia Maldonado, Title IX Deputy Coordinator (Illinois)	
(630) 889-6546 <a href="mailto:ymaldonado@nuhs.edu">ymaldonado@nuhs.edu</a>	Janse Hall, 2nd Floor
Mr. Andrew Wozniak, Title IX Deputy Coordinator (Illinois)	
(630) 889-6878 <a href="mailto:awozniak@nuhs.edu">awozniak@nuhs.edu</a>	Janse Hall, 1st Floor
Ms. Erin Myover-Piotrowski, Illinois Confidential Advisor	
(630) 889-6548 <a href="mailto:emyover@nuhs.edu">emyover@nuhs.edu</a>	Janse Hall, 2nd Floor

Further information about Title IX and sex discrimination in education is available from the U.S. Department of Education, Office for Civil Rights, Lyndon Baines Johnson Department of Education Building 400 Maryland Avenue, SW, Washington, DC 20202-1100 800-421-3481; TDD: 800-877-8339; email: [OCR@ed.gov](mailto:OCR@ed.gov) or on the web at: <https://wdcrobcolp01.ed.gov/cfapps/OCR/contactus.cfm>

## **Help: (Local, Regional & National) Resources for Victims of Domestic & Dating Violence, Sexual Assault and Stalking**

The needs of someone who has been the victim of violence or sexually assaulted vary from person to person and may vary over time. The University has gathered and listed a diverse array of services and external resources, many of which may be accessed 24 hours a day, so that a person may choose what she or he would find most helpful and healing.

The University urges anyone who has been sexually assaulted to seek support as soon as possible to minimize and treat physical harm, assist with processing the unique and complex emotional aftermath, and help preserve and understand options for pressing charges. Even for someone who does not wish to report the event to the police or pursue disciplinary action, seeking medical attention as soon as possible is important. At any point that an individual is ready to come forward, the University is prepared to help her or him.

### **Campus Security**

- NUHS-Illinois, Security from on-campus phone (Ext. 311)
- NUHS-Illinois, Security off campus phone (630) 927-9957.
- NUHS-Florida, Security Dispatch phone (727) 791-2560.

### **Police (Non-Emergency)**

- Lombard, IL (630) 873-4400
- DuPage County Sheriff (630) 407-2000
- Pinellas Park, FL (727) 369-7864
- Pinellas County Sheriff (727) 582-6200

### **Rape Crisis/Sexual Assault**

- National Sexual Assault Hotline: 1-800-656-HOPE. <http://www.rainn.org>
- Center for Disease Control & Prevention: (800) 232-4636
- AIDS National Hotline: (800) 232-6346
- Illinois - Coalition Against Sexual Assault: (217) 753-4117
  - Rape Victim Advocates: (312) 443-9603
- Florida - Council Against Sexual Violence: (850) 297-2000
  - Suncoast Center: (727) 530-7273

### **Domestic Or Dating Violence, Child Abuse Outreach & Advocacy**

- National Sexual Violence Center: (877) 739-3895
- National Domestic Violence Helpline: (800) 799-7233
- Illinois
  - Family Shelter Services: (630) 221-8290
    - Hotline: 630-469-5650
  - Prairie Center Against Sexual Assault: (217) 753-8081
- Florida
  - Suncoast Center Abuse Hotline: (800) 962-2873
  - FL Council Against Sexual Violence: (850) 297-2000
  - FL Domestic Violence Hotline: (800) 500-1119

### **Stalking Resources**

- National Stalking Resource Center: (202) 467-8700
  - Hotline: 855-484-2846
  - <http://www.ncvc.org>
- Illinois Stalking Laws: <http://www.victimsofcrime.org/our-programs/stalking-resource-center/stalking-laws/criminal-stalking-laws-by-state/illinois>
- Florida Stalking Laws: <http://www.victimsofcrime.org/our-programs/stalking-resource-center/stalking-laws/criminal-stalking-laws-by-state/florida>

### **Counseling/Mental Health Services**

- National Alliance on Mental Health: (800) 950-6264. [www.nami.org](http://www.nami.org)
- Illinois:
  - DuPage County Crisis Intervention Unit: (630) 627-1700
  - NAMI of DuPage County: (630) 752-0066
  - IL Health & Human Services Helpline: (800) 843-6154
  - YWCA – Sexually assaulted women & children: (630) 790-6600

- Florida:
  - Suncoast Center: (727) 388-1220
  - University of South Florida Psychological Services Center: (813) 974-2496

### **Victim's Rights & Resources**

- The National Center for Victims of Crime: (202) 467-8700
- Directory of Crime Victim Services: <http://ovc.ncjrs.gov/findvictimservices>  
[links to crime victim services across the country]

### **Victim's Bill of Rights**

- Be informed of all reporting options.
- Be free from pressure to make a criminal report.
- Have any allegations of sexual misconduct, including sexual assault, harassment, domestic violence, dating violence and stalking, investigated and adjudicated by the appropriate campus, criminal and/or civil authorities.
- Be notified of existing campus and community medical services, victim advocacy, legal assistance, visa and immigration support, financial aid assistance, order of protection support, counseling and mental health services, whether or not the incident is reported to campus, criminal, and/or civil authorities.
- Receive, when required, the full prompt cooperation of campus personnel when obtaining, securing and preserving evidence.
- Be informed of options for, available assistance in, and how to request changes to academic, living, dining, transportation and working situations as well as protective measures offered by NUHS.

**Keep this in mind:** There are federal laws protecting you from retaliation of any kind (harassment, intimidation, threats, etc. – whether you report the incident or not.

### **Filing a Police Report**

A report to the police can empower the complainant by exercising her/his legal rights and can aid in the protection of others. NUHS staff will encourage the complainant to file a police report and will assist the complainant in notifying the police if requested. The police will then advise the complainant of the legal process.

1. On-campus investigation is typically conducted by the Title IX Coordinator/Deputy Coordinator.
2. Off-campus cases are usually investigated by the local Police or other law enforcement agency. When an investigation or legal proceedings occur off-campus, services are still available through the University.

There may be consequences to waiting to file a police report. Early reports may improve the preparation of a viable prosecution. Filing a police report immediately following the incident does not force the complainant to file charges and prosecute the respondent. However, it does aid in the preservation of valuable evidence if the complainant decides to pursue charges at a later date. The States Attorney makes all decisions regarding the prosecution of alleged crimes reported to law enforcement.

### **Sexual Assault & Interpersonal Violence Crimes: Definitions**

Sexual misconduct violates University policy (*Student Code of Conduct*, [\*Title IX and Sex Discrimination Policy\*](#), *Consensual Relationships - NUHS Employees and NUHS Students Policy*) and Federal Civil Rights Law (*Title IX of the Higher Education Amendments of 1972, 20 U.S.C. § 1681 et seq.*). Any complaints relating to this (Sexual Misconduct) form of prohibited conduct shall **not** be managed under the *NUHS Student Code of Conduct*. Instead, sexual misconduct complaints shall be processed using the policy known as the NUHS [\*Title IX and Sex Discrimination Policy\*](#).

In order to promote a clear understanding of the prohibited conduct that will be managed under the NUHS [\*Title IX and Sex Discrimination Policy\*](#), excerpts from the policy follow with key terms defined.

Sexual Misconduct is a broad term encompassing a range of behaviors including rape, attempted rape, sexual battery, attempted sexual battery, sexual assault (which includes any kind of nonconsensual sexual contact) intimate partner violence, stalking, sexual exploitation, sexual harassment, non-consensual sexual intercourse, voyeurism, possession of child pornography, public indecency and any other conduct of a sexual nature that is nonconsensual, or has the purpose or effect of threatening, intimidating, or coercing a person or persons. Sexual misconduct can occur between strangers or

acquaintances, including people involved in an intimate or sexual relationship. Sexual Misconduct can be committed by men or by women, and it can occur between people of the same or different sex. Other forms of misconduct are federally prohibited and reportable under “Title IX” and the “Clery Act,” consequently, these offenses are also processed using the NUHS [\*Title IX and Sex Discrimination Policy\*](#). They are:

a. **Dating Violence:**

- i. *In Illinois*, dating violence is defined as “physical abuse, harassment . . . interference with personal liberty or willful deprivation” directed toward “persons who have or have had a dating or engagement relationship. [N]either a casual acquaintanceship nor ordinary fraternization between 2 individuals in business or social contexts shall be deemed to constitute a dating relationship.” 750 ILCS 60/103
- ii. *In Florida*, dating violence is defined as “violence between individuals who have or have had a continuing and significant relationship of a romantic or intimate nature. The existence of such a relationship shall be determined based on the consideration of the following factors: a dating relationship must have existed within the past 6 months, the nature of the relationship must have been characterized by the expectation of affection or sexual involvement between the parties, the frequency and type of interaction between the persons involved in the relationship must have included that the persons have been involved over time and on a continuous basis during the course of the relationship. The term does not include violence in a casual acquaintanceship or violence between individuals who only have engaged in ordinary fraternization in a business or social context.” Florida Statute 784.046

b. **Domestic Violence:**

- i. *In Illinois*, is defined as “physical abuse, harassment, intimidation of a dependent, interference with personal liberty or willful deprivation, but does not include reasonable direction of a minor child by a parent or person in loco parentis.” 750 ILCS 60/103
- ii. *In Florida*, is defined as “any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense resulting in physical injury or death of one family or household member by another family or household member, Florida Statute 741.28

c. **Stalking:**

- i. *In Illinois*, stalking is defined as “knowingly and without lawful justification, on at least 2 separate occasions, follows another person or places the person under surveillance or any combination thereof.” 720 ILCS 5/12-7.30
- ii. *In Florida*, stalking is defined as “a person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person and makes a credible threat to that person.” Florida Statutes 784.048

d. Stalking also includes **Cyber-stalking:**

- i. *In Illinois*, cyber-stalking is committed when “he or she knowingly and without lawful justification, on at least 2 separate occasions, harasses another person through the use of electronic communication. 720 ILCS 5/12-7.5
- ii. *In Florida*, cyber-stalking is defined as “to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail, or electronic communication, directed at a specific person, causing substantial emotional distress to that person and serving no legitimate purpose.” Florida Statute 784.048

Most sexual misconduct includes nonconsensual sexual contact, but it is not a necessary component. Threatening speech, which is sufficiently serious to constitute sexual harassment, for example, constitutes sexual misconduct. Photographs, video or other visual or auditory records of sexual activity made without explicit consent constitute sexual misconduct, even if the activity documented was consensual. Similarly, sharing such recordings without explicit consent is a form of sexual misconduct. For example, **distributing a harassing electronic recording** may also constitute an offense.

- Under Illinois law, consent is defined as “(i) a freely given agreement to the act of sexual activity, (ii) a person’s lack of verbal or physical resistance or submission resulting from the use of threat or force does not constitute consent, (iii) a person’s manner of dress does not constitute consent, (iv) a person’s consent to past sexual activity does not constitute consent to future sexual activity, (v) a person’s consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another, (iv) a person can withdraw consent at any time, and (vii) a person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to the circumstances, including without limitation the following: (A) the person is incapacitated due to the use or influence of alcohol or drugs; (B) the person is asleep or unconscious; (C) the person is under age; or (D) the person is incapacitated due to a mental disability.” 110 155/5 ILCS
- Under Florida law, consent is defined as “intelligent, knowing, and voluntary consent and does not include coerced submission. Consent shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.” Florida Statute 794.011

**“Incapacitation”** The physical and/or mental inability to make informed, rational judgments. States of incapacitation include, without limitation, sleep, blackouts, and flashbacks. Where alcohol or other drugs are involved, one does not have to be intoxicated or drunk to be considered incapacitated. Rather, incapacitation is determined by how the alcohol or drugs consumed impacts a person’s decision-making capacity, awareness of consequences, and ability to make informed judgments. The question is whether the respondent person knew, or a sober, reasonable person in the position of the respondent should have known, that the complainant was incapacitated. Because incapacitation may be difficult to discern, everyone is strongly encouraged to err on the side of caution (i.e., when in doubt, assume that the person is incapacitated and therefore unable to give consent. Being intoxicated or drunk is never a defense to a complaint of sexual misconduct).

### **Students – Filing a Title IX Complaint**

NUHS’s response to a complaint of domestic violence, dating violence, sexual assault, or stalking is to have the Title IX Coordinator meet with the complainant in order to provide to the complainant a general understanding of the forms of support that are available, immediate intervention measures that can be implemented and to address the complainants’ physical and emotional well-being as well as the safety of the community, and to explain various reporting options (including to refrain from reporting) the complainant may pursue. Depending on the type of resolution sought by the complainant, the Title IX Coordinator may assign a Title IX Deputy Coordinator to investigate the complaint. The complainant may decide to seek an Informal Resolution, Formal Resolution or no resolution at all. Mediation between the parties will not be used to resolve sexual violence complaints. The Title IX Deputy Coordinator will explain to both parties the process and protection of rights of both the complainant (the party who brings the grievance or makes the complaint) and the respondent (the party about whom the grievance or complaint is brought). Both the complainant and respondent have certain shared or complementary rights in disciplinary hearings. These rights are listed below:

The complainant and the respondent have the right to be assisted by an advisor, including an advisor they choose at their own expense.

1. The complainant and the respondent have the right to access and review any information that will be used in the hearing.
2. The complainant and the respondent will be advised of the date, time, and location of a hearing, when scheduled. Both may attend and participate.
3. The Title IX Coordinator or Title IX Deputy Coordinator may accommodate concerns for the personal safety, well- being, and/or fears of confrontation of the complainant, respondent, and/or other witness during the hearing, in whatever manner and as determined in the sole judgment of the Title IX Coordinator or Title IX Deputy Coordinator, to be appropriate.
4. The Title IX Coordinator or Title IX Deputy Coordinator shall render the decision to the respondent and the complainant simultaneously and in writing within five business days, when the Informal or Formal Resolution Process is utilized. The Policy provides for the disclosure to the complainant of the final results of any disciplinary proceeding regarding a complaint of domestic violence, dating violence, sexual assault, or stalking.

5. Decisions may be appealed by both parties in accordance with the appeals criteria in the Policy. All parties will be informed in writing of the outcome of any appeal.

The standard of proof that exists for campus disciplinary proceedings is preponderance of evidence (i.e., more likely than not the event(s) occurred). A complainant's privacy concerns are weighed against the needs of NUHS to respond to certain incidents and crimes. To the greatest extent possible, all reports will remain private. However, information may be shared with appropriate departments and agencies under a need-to-know basis when it pertains to investigative needs and safety concerns of the campus community.

### **Assistance for Students (Complainant or Respondent) Involving Title IX**

The Title IX Coordinator or Students Services Office will assist students, including collaborating with Campus Security and other departments to provide:

1. Referral to a counselor, or referrals to outside provider(s).
2. Security Assistance.
3. Assistance in petitioning for a protection order. NUHS honors orders of protection, no-contact orders, restraining orders, or similar orders issued by a criminal, civil, or tribal court.
4. Withdrawal from the University.
5. An on-campus investigation and, if appropriate, initiate on-campus disciplinary procedures.
6. Other referrals as necessary.

### **University Disciplinary Sanctions Applicable to Students**

The Hearing Body (Informal–Title IX Deputy Coordinator, Formal–Committee on University Discipline) is required to consider suspending or expelling any student found responsible for Sexual Misconduct; however, the Committee may impose any sanction that it finds to be fair and proportionate to the violation. In determining an appropriate sanction, the Hearing Body may consider any record of past violations of the NUHS Standards of Conduct, as well as the nature and severity of such past violation(s). The Hearing Body will also consider, as part of its deliberations, whether the sanction(s) will (a) bring an end to the violation in question, (b) reasonably prevent a recurrence of a similar violation, and (c) remedy the effects of the violation on the complainant and the University community. The Hearing Body will make the sanction decision by majority vote. Any sanction(s) imposed will be explained or supported in the written decision of the Hearing Body.

### **Employees (Faculty and Staff) – Filing a Title IX Complaint**

If a faculty or staff member is involved as the complainant or respondent:

1. All incidents are to be reported to the Title IX Coordinator (Mrs. Tracy McHugh) at (630) 889-6607, by email at [tmchugh@nuhs.edu](mailto:tmchugh@nuhs.edu), or in person at the Office of the Vice President for Administrative Services (VPADS), Janse Hall, 1st Floor.
2. Based on the initial report of the incident, the Title IX coordinator will implement any temporary safety measures immediately.
3. Depending on the resolution sought by the complainant, the Title IX coordinator may assign a Title IX Deputy Coordinator to investigate the incident.
4. When a complainant selects the Informal or Formal Resolution Process, The Title IX Coordinator or Title IX Deputy Coordinator will investigate the incident and submit a final outcome letter to the parties involved.
5. When a complainant selects the Informal or Formal Resolution Process, both the complainant and respondent will be notified in writing of the final results of the investigation and any resulting actions.
6. Both the complainant and respondent may appeal the final determination pursuant to the [Title IX and Sex Discrimination Policy](#).

The standard of proof that exists for campus disciplinary proceedings is preponderance of evidence (i.e., more likely than not the event(s) occurred). If a complainant requests that his or her name not be revealed to the respondent or asks NUHS not to investigate or seek action against the respondent, NUHS will be limited in its ability to respond fully to the incident.

### **Assistance for Employees (Complainant or Respondent) Involving Title IX**

The Title IX coordinator or Human Resource Department will assist faculty and staff, including collaborating with Campus Security and other departments to provide:

1. Security Assistance.
2. Assistance in petitioning for a protection order. The University honors orders of protection, no-contact orders, restraining orders, or similar orders issued by a criminal, civil, or tribal court.
3. An on-campus investigation and, if appropriate, initiate disciplinary/dismissal procedures.
4. Other referrals as necessary.

### **University Disciplinary Sanctions Applicable to Faculty and Staff**

The Hearing Body (Informal – Title IX Deputy Coordinator, Formal – NUHS Title IX Employee Hearing Committee) is required to consider discipline actions up to and including termination any employee found responsible for sexual misconduct; however, the Committee may impose any sanction that it finds to be fair and proportionate to the violation. In determining an appropriate sanction, the Hearing Committee may consider any record of past violations of the NUHS Employee Handbook, as well as the nature and severity of such past violation(s). The Hearing Committee will also consider, as part of its deliberations, whether the sanction(s) will (a) bring an end to the violation in questions, (b) reasonably prevent a recurrence of a similar violation, and (c) remedy the effects of the violation on the complainant and the University community. Any sanction(s) imposed will be explained or supported in the written decision of the Hearing Committee.

### **Interim Measures & Post-Hearing Rulings Applicable to Complainants and Respondents**

1. The complainant and/or respondent may have parking re-assigned.
2. The complainant and/or respondent may have on-campus residence changed.
3. The complainant and/or respondent may have his/her academic schedule/work schedule altered and/or arrangements with instructors to assist in offsetting potential academic problems will be immediately removed from campus and/or classes.
4. The respondent may be directed not to have contact, by any means, with a complainant.
5. The complainant may be directed not to have contact, by any means, with a respondent.
6. Any individual, who is alleged to have committed a violent act, including domestic violence, dating violence, sexual assault, or stalking upon a member of the campus community, may be banned from campus and campus activities.
7. Other conditions as deemed appropriate.

### **Privacy and Respect of Information**

Respecting one's right to privacy is important to NUHS. Students can be assured that when they share information with medical, police, and/or University officials, such information will be handled professionally and within the framework of each agency's governing body privacy limitations (e.g., state law, licensing, FERPA, etc.).

All employees, other than Title IX Officials, at NUHS are designated as Responsible Employees. A responsible employee is a person who has the authority to take action to redress sexual violence; who have been given the duty of reporting incidents of sexual violence or any other misconduct by students to the Title IX coordinator or appropriate school designee; or whom a student could reasonably believe has this authority or duty. All responsible employees shall report all complaints of sexual violence to the Title IX coordinator.

A student's privacy concerns are weighed against the needs of NUHS to respond to acts of harassment, or domestic violence, dating violence, sexual assault, and stalking. To the greatest extent possible, all reports will remain private. However, information may be shared with appropriate departments and agencies under a need-to-know basis when it pertains to investigative needs and safety concerns of the campus community. If a complainant requests that his or her name not be revealed to the respondent or asks NUHS not to investigate or seek administrative action against the respondent, NUHS will be limited in its ability to respond fully to the incident. Title IX and the Campus SaVE Act include protections against

retaliation. NUHS officials will not only take steps to prevent retaliation but will also take strong responsive action if it occurs.

### **Mandatory Disciplinary Hearing Disclosures to Complainants and Respondents**

In addition to complying with Title IX and FERPA, the University is required to comply with the federal Clery Act. Under the Clery Act, both the complainant and the accused student must be informed of the hearing outcome, and the University may not impose any limitations on the re-disclosure of this information. Accordingly, following the hearing, the Hearing Committee will issue a written decision letter (the "Final Outcome Letter"), concurrently to both the respondent and the complainant. The Final Outcome Letter will set forth, as required by the Clery Act, the name of the respondent, the violation(s) of Policy for which the respondent was found responsible, if any; any essential findings supporting the Committee's decision on the issue of responsibility; and the sanction(s) imposed, if any. University policy neither encourages nor discourages the further disclosure of the Final Outcome Letter by either the complainant or the respondent. The University acknowledges that sharing the Final Outcome Letter with others, including family, friends, legal counsel, mental health professionals, and sexual assault advocates or victims, may be a critically important part of a student's healing process.

If the alleged victim is deceased as a result of the crime or offense, NUHS will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

### **Policy Statement for Disciplinary Action in Sex Offense Hearing**

The *Clery Act* (20 U.S.C. § 1092(f)), the *Campus Security Act of 1990*, Section 203 (and as amended in 1998) amends Section 438 (b) of the *General Education Provisions Act* (commonly referred to as the "Buckley Amendment"). The *Campus Security Act of 1990*, Section 203 (and as amended in 1998) requires that both parties (alleged victim and accused) be informed of the outcome, including sanctioning information, of any University disciplinary proceeding alleging a sex offense. The Vice President for Administrative Services (also the NUHS *Title IX Coordinator*), or his/her designee, will disclose the results of the University's disciplinary proceeding to both parties.

### **Sexual Harassment Policy**

The National University of Health Sciences strives to maintain learning and work environments free of any conduct that constitutes, or has the potential to constitute, a barrier to the fulfillment of its mission. Harassment, particularly sexual harassment, is a type of behavior in direct conflict with the educational, scholarly, research, and service purposes of the University. It is prohibited by law and by the [NUHS Non-Discrimination and Anti-Harassment Policy](#).

- **Students** who believe they have been harassed by another student, an employee of the University, or any other agent of the University, should promptly report it to the Dean of Students. Sexual Harassment is a form of sexual discrimination prohibited by federal law under *Title IX of the Higher Education Amendments of 1972*, 20 U.S.C. § 1681 *et seq.* (See: NUHS [Title IX and Sex Discrimination Policy](#)).
- **Employees** who believe a student, an employee of the University, or any other agent of the University, has harassed them should promptly report it to the Director of Human Resources.

### **Sex Offender Registration**

The Campus Sex Crimes Prevention Act is a federal law that requires NUHS to publicize information available to the public that provides resources where lists of registered sex offenders may be accessed. The Illinois Sex Offender Registry is the most reliable source of this information. The Registry posts the offender's last known address, convictions, current status and personal information (including photo ID's) updated daily by the Illinois State Police. It is a user-friendly, searchable database capable of sorting offender information by city, county and zip code, it is available online at: <https://www.isp.state.il.us/sor/> In Florida, the Registered Sex Offenders website can be accessed at: <http://offender.fdle.state.fl.us/offender/homepage.do>

Additionally, this same data has been published in the NUHS Student Handbook and is also available in the Office of Human Resources. Any questions or other inquiries regarding this information should be directed to the Vice President for Administrative Services or the Dean of Students.

Effective Jan. 1, 2012, the Sex Offender Registration Act (Public Act 97-0155) mandated any sex offender or sexual predator employed at or attending an institution of higher education register (within three days of beginning school or employment) with respective campus police department.

## Hate Crime Definitions

**Hate Crimes:** A criminal offense committed against a person or property which is motivated, in whole or part, by the offender's bias. Bias is a preformed negative opinion or attitude toward a group of persons based on their race, gender, gender identity, religion, disability, sexual orientation or ethnicity/national origin.

NUHS is required to report statistics for bias-related (hate) crimes by the type of bias as defined below for the following classifications: murder/non-negligent manslaughter, sex offenses (forcible and non-forcible), robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, simple assault, intimidation and destruction/damage/vandalism of property.

**Larceny-Theft:** The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. 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.

If a hate crime occurs where there is an incident involving intimidation, destruction/damage/vandalism of property, larceny-theft or simple assault, the law requires that the statistic be reported as a hate crime even though there is no requirement to report the crime classification in any other area of the compliance document.

## NUHS Fire Safety Report (34 CFR 668.49)

### Introduction

The *Higher Education Opportunity Act (HEOA)* became public law 110-315 in August 2008 requiring all institutions of higher education that provide residential housing facilities for students to develop an annual fire safety compliance report. Contents of this report reflect the requirements outlined in HEOA, which are included in the National University of Health Sciences (NUHS) fire safety program.

Elements of the campus housing fire safety annual compliance report consist of:

- Fire prevention policies and practices
- Fire safety educational and training initiatives
- Description of fire protection equipment in the residence halls
- Emergency evacuation procedures
- Fire safety statistics
- Plans for future improvements to the fire safety program

The 2016 Fire Log Summary (available upon request from the Director of Facilities & Security) also provides a brief description of the fires that occurred in on-campus residential housing for the 2015 calendar year. The Director of Facilities & Security oversees the fire safety program on the Lombard, Illinois campus. NUHS does not have on-campus housing at its Florida site.

This public disclosure is intended to inform current and prospective students and employees of the fire safety programs and policies in place at NUHS, and the institution's state of readiness to detect and respond appropriately to fire related emergencies. The Fire Safety Report can be viewed online after October 1st every year.

The Fire Safety Report is combined with the [Annual Campus Security Report](#). A printed copy of the Combined Annual Report will be available online, or upon request, from the Office of Student Services in Illinois or Florida after October 1st every year. The Office of Student Services phone number in Illinois is (630) 889-6542, in Florida is (727) 803-6121.

### **Fire Safety Program Objectives – Illinois Site**

It is the policy of NUHS to endeavor through astute observation and established industry practices to promote safe environmental conditions for faculty, staff, students, and visitors that are free from foreseeable fire hazards. The primary objective of the fire safety program for on-campus housing is to recognize hazardous conditions and take appropriate action before such conditions result in a fire emergency. This is accomplished by:

- Conducting periodic review and update of fire prevention policies,
- Conducting regularly scheduled fire drills in the residence halls,
- Promoting fire safety awareness for employees and students by conducting regularly scheduled training programs on fire prevention and emergency evacuation procedures,
- Inspecting, testing, and maintaining fire protection systems in accordance with National Fire Protection Association (NFPA) standards and Occupational Safety and Health Administration (OSHA) standards,
- Performing plans review and code consultation related to current capital improvement and remodeling projects,
- Mitigating fire hazards utilizing the information provided from regularly scheduled fire safety inspections performed by the Office of the State Fire Marshal (OSFM), the University's property insurance loss control consultant, and fire protection consultants.

### **Definition of Terms (as set forth in the Final Regulations of the HEOA)**

- **Cause of fire:** The factor or factors that give rise to a fire. The causal factor may be, but is not limited to, the result of an intentional or unintentional action, mechanical failure, or act of nature.
- **Fire:** Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.
- **Fire drill:** A supervised practice of a mandatory evacuation of a building for a fire.
- **Fire-related injury:** Any instance in which a person is injured because of a fire, including an injury sustained from a natural or accidental cause, while involved in fire control, attempting rescue, or escaping from the dangers of a fire. The term "person" may include students, faculty, staff, visitors, firefighters, or any other individuals.
- **Fire-related death:** Any instance in which a person (1) is killed as a result of a fire, including death resulting from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from the dangers of a fire; or (2) dies within one year of injuries sustained as a result of a fire.
- **Fire safety system:** Any mechanism or system related to the detection of a fire, the warning resulting from a fire, or the control of a fire. This may include sprinkler systems or other fire extinguishing systems, fire detection devices, stand-alone smoke alarms, devices that alert one to the presence of a fire, such as horns, bells, or strobe lights; smoke-control and reduction mechanisms; and fire doors and walls that reduce the spread of a fire.
- **Value of property damage:** The estimated value of the loss of the structure and contents, in terms of the cost of replacement in like kind and quantity. This estimate should include contents damaged by fire, and related damages caused by smoke, water, and overhaul; however, it does not include indirect loss, such as business interruption.

### **Fire Prevention Policies and Procedures**

Several fire prevention policies and procedures have been developed and implemented in an effort to complement the program objectives. Applicable NFPA, OSHA, residence hall regulations (excerpted from NUHS license agreement) and the NUHS Emergency Guide were referenced during the development of these policies. A summary of these policies is highlighted below:

#### *Holiday Decorations*

- All decorations and ornaments must be of fire-resistant or non-combustible material, listed by Underwriters Laboratory (UL) and approved for use.

- The use of live or cut Christmas trees is prohibited in university buildings.
- Artificial trees made of fire retardant materials or non-combustible materials labeled with UL or Factory Mutual (FM) approval ratings are allowed. No natural trees, wreathes, boughs or other decorations constructed from the branches of natural trees may be used. Metallic trees may create electrical hazards when placed in close proximity to the electrical supply; therefore, the use of electric lights on metallic trees is prohibited.
- Trees and other decorations must be located so as not to obstruct exit corridors or the operation of fire protection equipment (e.g. fire extinguishers, sprinkler heads, exit signs, fire alarm pull stations, smoke alarms or heat detectors). Trees should also not be placed in any manner that could present a fall or trip hazard, impede egress, or block emergency egress from any room. Do not affix or tie decorations to such equipment.
- Electric light strings should carry a UL or FM approval label. These lights should be checked for fraying, bare wires, loose connections, and cracked plastic parts. If any of these conditions are present, the string or cord should not be used. Use of miniature electric lights are encouraged since they are both cooler and more energy efficient than regular size lighting. Unplug holiday lighting when the area is unoccupied. Electric lights or electrically operated ornaments shall not be used on metal, aluminum or any other similar metal, which could induce an electric shock. Light strings should not be placed in any manner that could present a fall or trip hazard, impede egress, block emergency egress from any room, or restrict access to fire protection equipment.
- Use of extension cords is discouraged. If they are used, they must be UL-approved and be of an adequate wire gauge for the intended use. Frayed or broken cords should not be used.
- Electrical cords (light strings or extension cords) should not be routed through doorways with doors, under rugs or loose carpeting or across work surfaces. Routing of cords through these areas may cause damage to the cord and create a tripping hazard.
- Do not plug cords and lights into an overloaded circuit. Multi-plug adapters are prohibited in university buildings. Use power strips with a fuse or integral circuit breaker when extra outlets are needed.
- Decorative displays should be compact. Garlands, streamers or displays that extend down a corridor should not be used because of their potential to spread fire, increase the fuel load, and impede egress. These displays should be confined to office areas (laboratories should not have any displays.) Displays are prohibited in stairwells and should be limited in corridors, lobbies, and common areas in the residence halls.
- All holiday decorations should be removed before leaving campus for the holidays and at the end of each trimester.
- No candles, incense burners, potpourri pots, or scented oil warmers may be used at any time in University buildings. Candles can be displayed in Menorahs and other religious articles but may not be used and should remain unlit. Battery operated candles are also allowed.
- Decorations should not conceal the room number located on the exterior of the room door. This number needs to be visible and readily identifiable for first responders.
- Decorative materials including artificial snow, decorative sprays, ceiling/wall tapestries, and highly flammable materials are strictly prohibited.
- Halogen and torch lamps are not recommended for use in campus housing.

#### *Electrical Equipment and Appliances*

- Use surge protectors/power strips for all electronics, particularly computers, televisions, DVD players, gaming systems, stereo equipment, and clock radios. Lightweight extension cords and multiple outlet plugs without surge protectors create a safety hazard and are discouraged.
- Open-ended heating elements and electrical appliances that may pose a fire hazard, such as hot plates, hot pots, electric or contact grills, and space heaters are prohibited. Electrical appliances with an enclosed heating element are permitted in the halls (e.g. popcorn makers and coffeepots) when used under continual supervision.

#### *Prohibited Items*

Items that pose a danger to persons, damage to University property, a fire/safety hazard, and/or a public nuisance must not be used, possessed, or stored in residence halls (including student rooms). These include:

- Internal combustion engines, acids, automobile batteries, gasoline, torches, flammable liquids, and halogen lamps.
- Charcoal and fire starter materials. Residents are discouraged from storing grills in their apartments; but are allowed to place the unit in the designated storage area, separate from all flammable materials (charcoal, propane, etc.).

#### *Tampering of Fire Protection Equipment*

- Students who are found tampering with fire protection equipment (e.g. fire extinguishers including cabinets and signage, fire alarms, smoke and heat detectors, pull stations, and sprinkler heads) resulting in violation of the Student Code of Conduct may be subject to fines and additional sanctions or charges for the cost of equipment or damage repair, depending on the circumstances, as a result of the disciplinary process. Additional anti-tampering policies include:
- All smoke detection and fire suppression systems are inspected and tested by licensed specialized service agencies, and residents are strictly prohibited from:
  - Disconnecting a detector,
  - Tampering with the detector or its operation,
  - Purposely causing an alarm to occur,
  - Hanging objects from or otherwise obstructing the sprinkler head cover plates and pipes.
- Disconnecting a smoke detector, failure to report its malfunctioning (including failure to observe that the light is on or not flashing), or other negligence subjects residents of that room not only to disciplinary charges but also to civil charges and, in the event of fire, payment for related damages to the building and the persons and property of others.
- Blocking open fire-rated door assemblies is strictly prohibited. Fire-rated door assemblies are UL listed and are designed to self-close and latch shut to prevent the passage of fire and smoke. Examples of fire-rated doors include: student room doors, stairwell doors, separation doors between a sleeping area and commons areas, utility room doors (e.g. janitor closets, mechanical rooms, laundry rooms, pressing rooms, sprinkler closets, elevator machine rooms, storage rooms, and any corridor doors).

#### *Regularly Scheduled Fire Safety Inspections*

As a part of scheduled safety inspections, Facilities and Security personnel inspect student rooms for the presence of fire safety hazards including, but not limited to:

- Non-polarized extension cords,
- Non-UL approved equipment,
- Multiple outlets without circuit breakers,
- Improper installation of microwave/refrigerator units,
- Decorations inconsistent with fire safety guidelines,
- Clearly observable room damage,
- Unauthorized furnishings,
- Other violations inconsistent with the university fire prevention policy,
- Candles with burned wicks.

Once identified, Facilities and Security personnel assist students in removing the fire hazard in accordance with the license agreement and the NUHS Student Code of Conduct.

An inspector with the OSFM also performs inspections in the residence halls on an annual basis. This gives the University the ability to address and mitigate any life safety violations identified by the inspector.

#### *Residence Hall Smoking Policy*

- NUHS is a smoke-free campus.
- No smoke is allowed, including that created by cigarettes, cigars, pipes, candles, or incense.
- Smoking is not permitted inside any residence hall building, including student rooms, hallways, bathrooms, elevators, lounges, and other public spaces.
- No smoking is permitted within 15 feet of, or next to, any door entrances, operable windows or air intake vents.

### **Fire Safety Education and Training Initiatives**

Residence hall staff, maintenance personnel and security officers receive fire safety training annually. Topics include a review of the fire prevention policies, weather safety, followed by a hands-on fire extinguisher demonstration, and an emergency evacuation exercise.

Fire drills are conducted in coordination with the Facilities and Security Department and the Lombard Fire Department. As outlined in the NUHS license agreement, participation in fire drills is mandatory and failure to evacuate the building during a fire alarm will result in disciplinary action. The Facilities and Security Department and the Fire Department critique the drills to identify problem areas, which are then discussed and resolved with Housing staff.

Fire safety training programs are also provided to other student, staff, and faculty groups on campus by request. This program typically consists of a brief review of fire prevention policies and procedures.

### **Overview of Fire Safety Systems in the Residence Halls**

The University houses students in four residence halls (Lincoln Hall, Tieszen Hall, Turek Hall and Buchholz Hall.) University housing is only available at the Illinois site. This section provides a brief summary of the fire system within each housing facility.

#### *Buchholz, Lincoln, Turek, and Tieszen Halls*

All of NUHS' residence halls, Buchholz, Lincoln, Turek and Tieszen, are monitored by a supervised fire alarm system. The entire building structure for all four buildings is protected by an automatic wet sprinkler system that is integrated with the fire alarm system for monitoring purposes. The fire alarm system is continuously monitored and supervised by the ALM Enterprises; providing radio dispatch to both 911 (Lombard Police and Fire) and Campus Security. The detection devices are serviced annually by Simplex-Grinnell and PA Crimson. Metropolitan Fire Protection Inc. services the sprinkler system and all associated components annually. There are no common cooking areas; therefore, no special halon based systems are installed in any of the buildings. Pressurized standpipes are located in two conveniently situated stairwells in each of the independent buildings. Multi-purpose ABC dry chemical fire extinguishers are installed on each floor as well as throughout the common areas and mechanical spaces in the complex. Carbon monoxide detectors are installed in all areas where Natural Gas operated equipment is operational. Other features include an area of rescue assistance and battery operated emergency lighting designed to illuminate the means of egress in the event of an emergency. The elevator cars are designed to travel to the first floor under an alarm condition to prevent entrapment and all multi floor duct penetrations for HVAC delivery to the common areas (halls, lobby, etc.) are protected by heat activated fire dampers to prevent the travel of fire to other areas in the building.

#### *Inspection, Testing, and Maintenance of Fire Protection Equipment*

The Facilities and Security Department administers this element of the residence hall fire safety program. All fire protection equipment in the residence halls is tested, inspected, and maintained in accordance with applicable NFPA standards.

### **Emergency Evacuation Procedures**

If a fire occurs in a residence hall, the fire alarm response procedure is initiated by housing or security personnel with support from first responders (e.g. Lombard Fire Department). Facilities and Security personnel may also provide support in the investigation, restoration, and cleanup efforts. Fire alarm systems notify building occupants of a potential fire, thus initiating a building evacuation sequence. As conveyed during fire drills, building occupants are directed to the nearest building exit upon activation of the fire alarm system. Use of the elevators is strictly prohibited and is controlled by the fire department to assist in firefighting and rescue efforts. Building occupants cannot re-enter the building until either Campus Security or the fire department indicates that it is safe to do so. After every fire alarm activation or reported fire condition, the housing or security personnel on duty is responsible for submitting an NUHS Accident/Incident Report to the Director of the Facilities and Security Department. Emergency evacuation procedures for students and employees inhabiting other campus buildings can be found within those buildings. The emergency procedures are posted in classrooms, offices, and other places of public assembly across campus.

### **List of Titles to Whom a Report of Fire Should Be Made**

Per federal law, NUHS is required to annually disclose statistical data on all fires that occur in on-campus student housing facilities. Listed below are the non-emergency numbers to call to report fires that have

already been extinguished in on-campus student housing. These are fires for which you are unsure whether the NUHS Housing Office may already be aware. If you find evidence of such a fire or if you hear about such a fire, please contact one of the following:

- NUHS Security Office: (630) 927-9957
- NUHS Housing Office: (630) 889-6661
- NUHS Director of Facilities: (630) 889-6638

### **Fire Safety Statistics**

The data presented in the following table summarizes the reported fires that occurred in on-campus housing facilities for the 2016 calendar year. Fire statistics from off campus housing are not included in this report. This data is also available online at <http://www.ope.gov>.

<b>Summary of 2017 Fire Safety Statistics</b>					
Residence Hall	Number of Fires	Causes	Injuries	Fatalities	Value Prop. Damage
Lincoln Hall	0	N/A	N/A	N/A	N/A
Turek Hall	0	N/A	N/A	N/A	N/A
Tieszen Hall	0	N/A	N/A	N/A	N/A
Buchholz Hall	0	N/A	N/A	N/A	N/A

### **Plans for Future Improvements to the Fire Safety Program**

A comprehensive assessment of all four (4) NUHS on-campus student housing facilities was undertaken (in collaboration with the local Fire District officials) to evaluate the status of the dormitories, relative to fire code standards compliance. All four student housing units were extensively renovated and construction completed in 2012-2013. The fire code assessment was completed by 2017, with minor repairs and upgrades completed by the Spring of 2018 with all units in full compliance with the local fire code. An annual fire drill of the student housing units is planned in cooperation with the Lombard Fire District within this calendar year.

## Appendix A: NUHS Crime & Student Housing Statistics (2017)

NUHS CRIME STATISTICS - Lombard, IL Site – Main Campus			
January 1 2015 – December 31, 2017	2015	2016	2017
<u>Criminal Offenses</u>	---	---	---
Criminal Homicide	---	---	---
Murder/ Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses	---	---	---
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	3	1	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<u>Hate Crimes</u>	---	---	---
Larceny – Theft	0	0	0
Simple Assault	0	0	0
Intimidation	0	1	0
Destruction/damage/vandalism of property	0	0	0
<u>VAWA Offenses</u>	---	---	---
Domestic Violence	1	0	0
Dating Violence	0	1	0
Stalking	1	0	1
<b>Total Incidents</b>	<b>5</b>	<b>3</b>	<b>1</b>
Liquor Law: Referral/Arrest	0/0	0/0	0/1
Drug Violations: Referral/Arrest	0/0	0/0	0/6
Weapons Possessions: Referral/Arrest	0/0	0/0	0/1
<b>Total Arrests</b>	<b>0</b>	<b>0</b>	<b>*8</b>

\*Local Police Headquarters is 2 blocks from NUHS main campus. Over 1600 traffic arrests are made annually by LPD. Approx. 132 occurred when police filed reports using street addresses that involved NUHS "public" Clery geography. The majority of arrests are for non-reportable offenses. However, 7 reportable arrests occurred on NUHS Clery property: 6 drug abuse & 1 liquor law violations. None of the arrests involved NUHS students or employees.

**NUHS CRIME STATISTICS - Lombard, IL Site – Aurora Clinic**

January 1 2015 – December 31, 2017	2015	2016	2017
<u>Criminal Offenses</u>	---	---	---
Criminal Homicide	---	---	---
Murder/ Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses	---	---	---
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<u>Hate Crimes</u>	---	---	---
Larceny – Theft	0	0	0
Simple Assault	0	0	0
Intimidation	0	0	0
Destruction/damage/vandalism of property	0	0	0
<u>VAWA Offenses</u>	---	---	---
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
<b>Total Incidents</b>	<b>0</b>	<b>0</b>	<b>0</b>
Liquor Law: Referral/Arrest	0/0	0/0	0/0
Drug Violations: Referral/Arrest	0/0	0/0	0/0
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0
<b>Total Arrests</b>	<b>0</b>	<b>0</b>	<b>0</b>

**NUHS ON-CAMPUS STUDENT HOUSING – Crime Statistics - Lombard, IL**

<u>January 1 2015 – December 31, 2017</u>	Tieszen	Buchholz	Turek	Lincoln
<u>Criminal Offenses</u>	---	---	---	---
Criminal Homicide	---	---	---	---
Murder/ Non-negligent manslaughter	0	0	0	0
Negligent manslaughter	0	0	0	0
Sex Offenses	---	---	---	---
Rape	0	0	0	0
Fondling	0	0	0	0
Incest	0	0	0	0
Statutory Rape	0	0	0	0
Robbery	0	0	0	0
Aggravated Assault	0	0	0	0
Burglary	0	0	0	0
Motor Vehicle Theft	0	0	0	0
Arson	0	0	0	0
<u>Hate Crimes</u>	---	---	---	---
Larceny – Theft	0	0	0	0
Simple Assault	0	0	0	0
Intimidation	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0
<u>VAWA Offenses</u>	---	---	---	---
Domestic Violence	0	0	0	0
Dating Violence	0	0	0	0
Stalking	0	0	1	0
<b>Total Incidents</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
Liquor Law: Referral/Arrest	0/0	0/0	0/0	0/0
Drug Violations: Referral/Arrest	0/0	0/0	0/0	0/0
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0	0/1
<b>Total Arrests</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>

**NUHS CRIME STATISTICS - Health Education Center, FL Site**

<u>January 1 2015 – December 31, 2017</u>	2015	2016	2017
<u>Criminal Offenses</u>	---	---	---
Criminal Homicide	---	---	---
Murder/ Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses	0	---	---
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	1
Arson	0	0	0
<u>Hate Crimes</u>	---	---	---
Larceny – Theft	0	0	3
Simple Assault	0	0	0
Intimidation	0	0	0
Destruction/damage/vandalism of property	0	1	0
<u>VAWA Offenses</u>	---	---	---
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
<b>Total Incidents</b>	<b>0</b>	<b>1</b>	<b>4</b>
Liquor Law: Referral/Arrest	0/0	0/0	0/0
Drug Violations: Referral/Arrest	0/0	0/0	0/0
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0
<b>Total Arrests</b>	<b>0</b>	<b>0</b>	<b>0</b>

**NUHS CRIME STATISTICS – Pinellas Park Clinic, FL Site**

<u>January 1 2015 – December 31, 2017</u>	2015	2016	2017
<u>Criminal Offenses</u>	---	---	---
Criminal Homicide	---	---	---
Murder/ Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses	0	---	---
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<u>Hate Crimes</u>	---	---	---
Larceny – Theft	0	0	0
Simple Assault	0	0	0
Intimidation	0	0	0
Destruction/damage/vandalism of property	0	0	0
<u>VAWA Offenses</u>	---	---	---
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Total Incidents	0	0	0
Liquor Law: Referral/Arrest	0/0	0/0	0/0
Drug Violations: Referral/Arrest	0/0	0/0	0/0
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0
Total Arrests	0	0	0

## Safety Tips

- Always keep your doors and windows locked. Never leave personal property unattended.
- If possible, let a friend or roommate know where and with whom you'll be and when you'll return.
- Trust your instincts! If you feel uncomfortable about someone near you on the street, in an elevator or getting off a bus, head for a populated place or yell for help.
- Use well-lit and busy sidewalks.
- Avoid walking alone, walking near vacant lots, alleys, or wooded areas. Call Campus Security to be escorted.
- Carry a cell phone, whistle or a personal alarm to alert people that you need help.
- Attend an educational course and learn what can be done to avoid vulnerability to crimes like sexual assault, relationship violence and stalking.
- Try to park in an area that will be well-lit and heavily traveled when you return.
- Lock your car doors and roll up the windows completely, even if you're only running a quick errand. Do not leave valuables in plain view.
- If you choose to drink, drink legally and responsibly. Remember that your ability to respond is diminished by over-consumption of alcohol.
- Stay alert at all times and call the police immediately to report suspicious activity.
- Follow all rules of the road when driving a car, riding a bike or using other forms of personal transportation such as rollerblades, skateboards or scooters.
- Put ICE (In Case of Emergency) in your cell phone, along with a name and telephone number of a loved one, to enable emergency services personnel to contact your family in the event of an emergency.
- Listening to loud music, wearing headphones or using your cell phone distracts you from being alert to potential safety issues. Unplug yourself and tune in to your immediate environment.
- Utilize crosswalks at all times and obey the signals at intersections when walking. In most states, as a pedestrian, you DO NOT have the right of way until you establish yourself in the crosswalk. If you are crossing at any location other than a crosswalk, you MUST yield to vehicular traffic.
- When driving, be aware of pedestrians and bicyclists and yield to them when required by law.