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**APPENDIX A**: Controlled Substance Policy

**APPENDIX B**: Sexual Harassment Policy
NOTICE OF NONDISCRIMINATION

Hebrew Theological College treats all employees, students, and applicants without unlawful consideration or discrimination as to race, creed, color, national origin, sex, age, disability, marital status, genetic predisposition, sexual orientation or citizen status in all decisions, including but not limited to recruitment, the administration of its educational programs and activities, hiring, compensation, training and apprenticeship, promotion, upgrading, demotion, downgrading, transfer, layoff, suspension, expulsion and termination, and all other terms and conditions of admission, matriculation, and employment. Inquiries or complaints concerning the non-discrimination policies should be sent to Cheryl Karp, Title IX Coordinator, 7135 N. Carpenter Road, Skokie, Illinois 60077. Employees or students may alternatively file a complaint with the Office for Civil Rights by contacting their regional office /or the US Department of Education.

Please refer to the link provided for locations:
http://www2.ed.gov/about/offices/list/ocr_addresses.html or https://ocrcas.ed.gov/cas.cfm
OVERVIEW
In accordance with the Jeanne Clery and the Higher Education Opportunity Act, Hebrew Theological College has created this report identifying the following:

- Operations of the Office of Campus Safety and Security
- College policies pertaining to adherence to municipal, state and federal laws
- Policies and procedures regarding reporting of incidents, missing students, access into facilities, fire safety, emergency response and notification systems
- Crime prevention programs
- Statistical information on crimes that occurred in or near Hebrew Theological College property over the past three years
- Fire related incidents that occurred in student residential facilities
- Life safety systems installed in student residential facilities.

Faculty, staff and students are notified by email of the availability of the Annual Crime Statistics & Fire Safety Report on the website. Hard copies of this brochure are also available in the Office of the Registrar upon request.

ANNUAL SUBMISSION OF REPORTS
An Annual Security Report (“ASR”), including Crime Statistics for the reporting calendar year, will be prepared timely by security director/designee(s) and the Office of Institutional Compliance and published in accordance with federal regulations under the Clery Act.

A) The ASR will be posted to the Hebrew Theological College website on or before the first (1) day of October of each year.
B) The ASR will include Crime Statistics by appropriate location, where applicable, and will include the previous three (3) years of reported statistics.
C) Notification of the availability of the ASR must be sent on or before the first (1) day of October of each year to students, faculty and employees by available means. The notification will include the link to the report and the Crime Statistics.
D) Hebrew Theological College provides the notification via email communications and, where applicable, posting on bulletin boards within the facility.
E) Distribution is made electronically via web page, email communication or hard copy upon request.
F) Documentation of the steps taken to comply with the notification process is required, when available.

BUILDING ACCESS & SECURITY POLICY
During regular business hours, Hebrew Theological College is open to the college community, guests and others with legitimate college business. The hours of operation for the campuses vary based on the building location and the academic school year.
STUDENT RESIDENTIAL FACILITIES ACCESS POLICY
Access into student residential facilities is restricted to residents, their approved guests and other approved members of the Hebrew Theological College community. Access is strictly monitored and regulated by key card. Policies and procedures pertaining to guest privileges are governed by individual student housing facility management. Residents are cautioned against permitting strangers access into student residential facilities and are encouraged to maintain a community watch for suspicious activity or behavior.

SECURITY
The College attempts to provide for the security of individuals and their belongings through a security system that includes locks for rooms and buildings, controlled access to buildings, alarm systems and/or video monitoring.

Security measures are only as effective as the individuals on campus choose to make them. Students are encouraged to use sound judgment at all times. Campus buildings have controlled access via number code. Students are not to distribute these codes to non-students. Students residing on-campus are prohibited from giving keys or codes to non-residents.

At times it may be necessary to establish other security checks and procedures and it is expected that students will cooperate fully in carrying out security procedures, all of which are designed to promote the safety and security of the College community.

All students, faculty and staff are expected to assume reasonable responsibility for personal safety. By using common sense, safety practices such as walking in groups, reporting suspicious activities, keeping money, books and other personal items protected, locking car, room and office doors when leaving and generally being alert to personal welfare will ensure personal safety on and off campus. All threats and/or altercations (verbal or physical) that are based on religious, gender or racial bias by either a member of the College community or a stranger must be reported.

Students should be their own safety advocates and take these strategies seriously:

- Stalker – If you feel someone is stalking you, make an immediate report to the college administration. A restraining order or some other action may be taken to keep you safe. If someone is following you suspiciously, head towards crowds, lighted areas or occupied buildings.

- Obscene Calls – Don’t engage an unknown caller in conversation or give any personal information. Keep track of unwanted phone calls and document the time and content of these calls. Save harassing or obscene phone messages, and turn over all of this information to the College administration.

- Walking Around - Don’t walk alone after dark. Stay in well-lit and populated areas.

- The Element of Surprise – Make it difficult for someone to surprise you. For example, don’t walk around or jog with headphones when you are alone.
• Protect Your Personal Property – Don’t leave backpacks, purses or other bags unattended; always lock your bike or car; don’t leave valuables in plain sight; don’t leave large amounts of cash in your room or on your person.

• Cyber-Safety - Despite the perceived anonymity of cyberspace, the internet and spam can pose serious threats. Releasing personal information (particularly your Social Security number or phone number) over the internet can result in identity theft and/or stalking. Identity theft is a long-hard road to overcome, often involving years of effort to reestablish damaged credit ratings and more. Meeting people on-line can be dangerous. On-line matchmaking can be risky and even religious based Shidduch sites require careful monitoring, and students are recommended to seek thorough background checks by a reliable authority before arranging a meeting with anyone.

To report or discuss security issues contact the Dorm Supervisor (Skokie Campus), the Eim Bayit or Facilities Manager (Chicago Campus), or a member of the administration.

CRIMES INVOLVING STUDENTS AT OFF-CAMPUS LOCATIONS
Hebrew Theological College does not allow student organizations to maintain off-campus locations. All individuals, whether they belong to the College community or not, are subject to all international, federal, state and local laws while on Hebrew Theological College campuses and sites and may be subject to criminal charges when applicable, even for first offenses. We encourage the Hebrew Theological College community to report any incidents promptly to both HTC security representatives (Dorm Supervisor on the Skokie Campus or the Eim Bayit or Facilities Manager on the Chicago Campus) and/or your local law enforcement agencies (where applicable). The College relies on its close working relationships with local law enforcement agencies to receive information about incidents involving students and employees at all College sites.

EMERGENCY PREPAREDNESS EFFORTS
Recognizing the importance of emergency preparedness, Hebrew Theological College has created a written document, School Emergency and Crisis Response Plan, outlining the College’s response and recovery to any emergency or crisis that “threatens the College populations, programs, properties, reputation, and viability.”

REPORTING OF CAMPUS EMERGENCIES
We ask for your cooperation with the reporting of any hazardous or emergency situation involving a threat to the health and safety of our College Community or loss of College property. Hazards, such as missing fire extinguishers, obstructed emergency exits, multiple or frayed electrical extension cords, candles, open flame devices or improperly contained hazardous materials must immediately be reported to the Dorm Supervisor (Skokie Campus) or the Facilities Manager (Chicago Campus). Emergency situations involving imminent threat to health and safety, which may be medical, criminal or involve a fire, should be called into the Police Department by dialing 911, followed by a call to the Dorm Supervisor (Skokie Campus) or Eim Bayit (Chicago Campus).
Timely Warning Reports & Public Safety Notices
This section summarizes Hebrew Theological College’s emergency response and evacuation procedures, including protocols for emergency notifications communications in those situations that represent a significant emergency or dangerous situation affecting the health and/or safety of the college community. This policy statement complies with the Emergency Notification requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, as amended by the Higher Education Opportunity Act of 2008 and applicable Department of Education regulations.

Critical safety information is provided under two circumstances:

Emergency notifications are near real-time information provided quickly for any life-threatening hazard. They will typically contain little detail, and will initially alert the community to a dangerous situation, provide information including where to get additional information (for example a website), and resolve or reassure the community the hazard has been controlled.

Timely Warnings are distributed for certain crimes in federally defined “Clery Act Geographies” that represent a threat to the Hebrew Theological College community; the College will provide a “Timely Warning.” If a crime takes place in the areas surrounding the campus, or is not one of the federally defined crimes (for example kidnapping), we will circulate a “Public Safety Notice.”

Both types of communications are described below. Please review this information so you are familiar with how Hebrew Theological College will reach out during an emergency.

Campus Security will prepare a Timely Warning/Public Safety Notice when a report is received of a violent crime against a person, or a particularly threatening crime against property on campus that represents an ongoing danger to the safety of students, faculty, and staff. Timely Warning/Public Safety Notices will provide details of the crime, a description of the suspect if known, and information on whom to contact about the investigation, and crime prevention tips.

When Campus Security becomes aware of crimes committed off-campus being investigated by local law enforcement that may present a serious or continuing threat to the campus community, a Timely Warning/Public Safety Notice may be issued. This will be determined by Campus Security on a case-by-case basis based on the facts of the situation, the possible impact to the campus community, and the information provided by local law enforcement.

We usually include the following information in timely warnings and public safety notices.

1. A succinct statement of the incident.
2. Possible connection to previous incidents, if applicable.
3. Physical description of the suspect.
4. Photo or composite drawing of the suspect, if available.
5. Date and time the notice was released.
6. Other relevant and important information including prevention advice.
Campus Security may not include some known information in a Timely Warning/Public Safety Notice if providing that information could risk compromising law enforcement efforts.

Timely Warning/Public Safety Notices may be updated if new or more accurate information becomes available to Campus Security.

Distribution of Timely Warnings or Public Safety Notices
Timely Warning/Public Safety Notices are distributed by Campus Security, in conjunction with the Department of Emergency Preparedness, in the following ways:

1. HEBREW THEOLOGICAL COLLEGE WEB SITES – Notices may be posted on the main Hebrew Theological College website, www.HTC.edu. The website will be updated with information throughout the duration of any serious incident.

2. CAMPUS EMERGENCY INFORMATION LINE, (847) 982-2501 (Skokie) or (773) 972-1927 (Chicago). Students and employees may call the Campus Emergency Information line for updated information about serious or ongoing threats to the campus community.

3. HEBREW THEOLOGICAL COLLEGE MASS E-MAIL – During regular business hours, 9:00am-5:30pm, an “urgent” mass e-mail will be sent to all HTC.edu email addresses. The message will provide instructions to follow during the incident, or direct individuals to the main Hebrew Theological College web site for additional information or instructions.

In some instances, Campus Security may distribute flyers to appropriate college departments to be posted in affected areas of the campus. After Hebrew Theological College locations are closed, alerts will be sent to all Hebrew Theological College community members with information and instructions on any relevant situation.

LAW ENFORCEMENT RELATIONSHIPS

Hebrew Theological College maintains a close working relationship with the Village of Skokie Police Department and the Chicago Police Department to ensure the safety and security of the college community. The College staff may also work with other law enforcement agencies as appropriate. Meetings are held between the College and representatives of law enforcement agencies on both a formal and informal basis. There is regular communication between the College and police departments regarding incidents that occur on and around the campus areas and regarding the general safety and security, including the exchange of information, assistance with investigations, and crime-related reporting. There are no written memoranda of agreement between Hebrew Theological College and any local, state or federal law enforcement agency.

EMERGENCY RESPONSE AND EVACUATION PROCEDURES EMERGENCY PREPAREDNESS
What is Emergency Preparedness (EMP)?

There is no single item that defines emergency preparedness. Emergency Preparedness depends on who you are and where you are. For a child, EMP is about following the instructions of
teachers during an emergency, knowing their name, address and telephone number, or knowing what to do if there is a fire at home.

For an adult, preparedness depends on whether or not someone is at home or at school. Is it summer or winter? Does one drive to work or take public transportation?

Each of these areas requires a different type of preparedness, so emergency preparedness is about thinking of the hazards that can threaten your safety, and developing a plan to minimize the effects of the hazard as much as possible.

The health and safety of all Hebrew Theological College students, faculty, and staff is of paramount concern to the College.

While the likelihood of a major emergency is remote, Hebrew Theological College recognizes the critical importance of being prepared and has designed a program that ensures the security of the College community in the event of a crisis.

The emergency plan identifies the College’s needs, the resources needed on hand during an emergency, and the steps needed to move forward after an emergency is resolved.

**Emergency Defined**

An emergency is an unanticipated crisis that arises, posing an IMMEDIATE or an IMMINENT threat to the life/lives, safety, and/or health of students, faculty, staff, or others on any Hebrew Theological College campus/site.

Since such situations call for rapid, competent, and responsive action, it is helpful to review the appropriate responses to possible emergency scenarios. Dial 911 to reach local fire or police departments.

Members of the College community can reach a representative of the College by contacting the emergency hotline number (847) 982-2501 (Skokie) or (773) 972-1927 (Chicago).

**Emergency Response Plan**

Hebrew Theological College’s Department of Emergency Preparedness (EMP) is responsible for the overall direction and planning for emergencies on campus or those that occur in the local or regional area affecting the campus. Under the guidance of the Director of EMP, the college has developed a comprehensive, all-hazard Emergency Response Plan that outlines steps the College will take to prevent and mitigate, prepare for, respond to, and recover from a full range of likely hazards it may face.

To ensure these plans remain current and actionable, the College will conduct an emergency management exercise, at a minimum, once yearly. These exercises may include tabletop drills, emergency operations center exercises, or full-scale emergency response exercises. The College conducts after-action reviews of all emergency management exercises.

Both announced and unannounced emergency evacuation and/or preparedness tests/exercises are conducted at least annually (once each year at minimum) in Hebrew Theological College buildings, including all facilities, and are recorded and analyzed for assessment purposes. The
emergency evacuation procedures are tested at least once each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. The administrators do not tell building occupants in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, administrative staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes. The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of a fire or other emergency. At Hebrew Theological College evacuation drills are used as a way to educate and train occupants on fire safety issues specific to their building. During the drill, occupants ‘practice’ drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm.

Emergency Procedures
The following section provides information on the procedures to follow during certain emergencies. This section is not intended to cover all emergencies, but is a general guide for the more common emergencies that occur on college campuses across the United States. Please review these procedures carefully.

If you have any questions, contact the Department of Emergency Preparedness at [(847) 982-2501 (Skokie) or (773) 972-1927 (Chicago)].

FIRE INCIDENT REPORTING
Students, faculty, and staff are instructed to call 911 to report a fire emergency.

Non-emergency notifications (e.g. evidence that something burned) are made to:

Hebrew Theological College’s 24 Hour Hotline at (847) 982-2501 (Skokie) or (773) 972-1927 (Chicago).

Fire Safety Education and Training Programs
An online fire safety education program is available for all students in residential housing and all employees that have any association with residential housing. Additional trainings are conducted by the Department of Emergency Preparedness throughout the year. Additional fire safety and education training programs may be taught by local authorities as necessary.

These programs are designed to familiarize everyone with the fire safety system in each housing facility, train everyone on the procedures to be followed in case there is a fire, and distribute information on the college’s fire safety policies. Everyone is also provided with evacuation routes and fire alarm equipment locations. During these programs, trainers emphasize that participating in fire drills is mandatory. Students with limited mobility are instructed to wait for emergency response personnel in the fire stairwell with a “buddy.”

If a fire occurs, students are instructed to leave hazardous areas per the evacuation routes and go to their Designated Assembly Area before calling 911 for help. All residents are instructed to pull the fire alarm as they are leaving the building if they can do so without risking their safety.
Residents are to remain at the Designated Assembly Area so that the Dorm Supervisor (Skokie Campus) or the Eim Bayit or Facilities Manager (Chicago Campus) can take a full accounting of the residents.

Fire safety education and training programs consist of fire science, general fire safety and evacuation procedures, and cooking safety. The information provided during the fire safety programs may be available at any time on the Emergency Preparedness page at www.HTC.edu.

*Fire Emergency Advice*

**During A Fire Alarm**

- STAY CALM and DO NOT PANIC.
- Proceed to the closest emergency exit. Do not take the elevator.
- Use secondary route if primary one is blocked or hazardous.
- If the emergency is a gas leak or a hazardous material spill, take the route that will keep you upwind of the problem area.
- Do not stop for belongings or records.
- Follow the instructions of your Fire Safety Group (FSGs).
- Report missing persons to FSGs.
- Continue to follow the directions of FSGs who will direct you to an assembly area. Remain at the assembly area in case Emergency Personnel need more information or need to ask questions, especially if there are missing persons.

In Case Of Fire - Remember “R.A.C.E.” Rescue: Anyone in immediate danger Alarm: Pull the nearest alarm box Contain: Close doors and windows Evacuate: Leave the building immediately

**Pre-Plan Escape Routes**

It is a good idea to locate all exits on your floor and in your building; locate two exits from your office/classroom; locate fire alarm pull stations in your building.

**Fire Egress (Exiting Safely)**

- Upon discovery of a fire, activate the nearest fire alarm pull box.
- Call the Hebrew Theological College emergency hotline number (847) 982-2501 (Skokie) or (773) 972-1927 (Chicago), or 911 from a local phone or your cell phone. Give your name, telephone number, department and location of the fire.
- Do not attempt to put out a fire by yourself, unless you are trained to do so.
- DO NOT USE THE ELEVATORS. If you are on an elevator when an alarm is activated and the elevator does not function, push the emergency button on the elevator for further assistance and guidance.
- Close windows and doors. This may help keep the fire from spreading, protect your possessions from fire, and smoke damage. Leave lights on and doors unlocked.
- Before entering another room or stairwell, check for heat by placing the back of your hand near the door. If the handle is NOT hot, open door cautiously. Check for smoke or fire before going out.
- If the handle is hot, DO NOT open the door. Go to the window and call for help.
- When you evacuate the building DO NOT stop for personal belongings or records.
• If there is excessive smoke, crawl low to an exit. There is less smoke and toxins there. Smoke will rise making it impossible to see when standing. Toxic chemicals in smoke, when inhaled, can be deadly in minutes.
• If you are unable to exit, stay low and plug all openings around doors, windows, and vents.
• Notify fire fighters that are on the scene if you suspect someone may be inside the building.
• If the situation is safe and clear, handicapped individuals should be placed into the stairwell as soon as most evacuees have departed. A messenger should be dispatched to tell the responding police or fire fighters the location of the handicapped individual(s), so that a rescue can be initiated.
• When outside, stay away from the building, at least 500 feet, and out of the way of emergency personnel and vehicles.

**DO NOT RE-ENTER THE BUILDING UNTIL INSTRUCTED TO DO SO BY AUTHORIZED PERSONNEL.**

**MISSING STUDENT POLICY AND PROTOCOL**

Hebrew Theological College understands that students will spend some time off campus. We recognize, however, we have an obligation and a responsibility to report a residential student who has been missing for 24 hours to proper authorities. If a member of the campus community has reason to believe a residential student is missing, notification should immediately be made to the Dorm Supervisor (Skokie Campus) or the Eim Bayit or Facilities Manager (Chicago Campus). In compliance with the federally mandated Missing Student Notification Policy and Procedures in the Higher Education Opportunity Act, an incident report will be generated and an investigation will be initiated. Unless circumstances dictate otherwise, Police Department, the missing student’s designated guardian, if under the emancipated age of 18, or emergency contact person, will be notified no later than 24 hours after the report has been generated. Additional notifications may be made as appropriate. A student who wishes to identify a confidential contact can do so through their Dorm Supervisor (Skokie Campus) or the Eim Bayit or Facilities Manager (Chicago Campus). A student’s confidential contact information will be accessible only by authorized campus officials and law enforcement as appropriate.

**ALCOHOL AND CONTROLLED SUBSTANCES POLICY STATEMENT**

It is the policy of HTC, as stated in the Personal Conduct section of the Student Handbook, that the unlawful use, possession, distribution, or manufacture of drugs or controlled substances on HTC property is strictly prohibited. Individuals who possess, use, distribute or manufacture drugs or controlled substances, are subject to disciplinary action, including but not limited to expulsion, as well as possible criminal prosecution. Improper use of prescription drugs is similarly prohibited. Students found in violation of these policies may be subject to disciplinary proceedings as described in the school catalog and student handbook. Student violators may be subject to the following sanctions and remedial measures:
<table>
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<th>Nature of Violation</th>
<th>Responses for First-Time Violations May Include, But Are Not Limited To:</th>
<th>Responses for Repeat Violations May Include, But Are Not Limited To:</th>
</tr>
</thead>
</table>
| Possession or use of alcohol or other drugs, including prescription drugs, in violation of HTC policy or federal, state, or local law | • Warnings  
• Disciplinary Probation  
• Counseling and treatment  
• Service to the college community | • Disciplinary Probation  
• Mandatory referral for counseling and treatment  
• Suspension from dormitory (if dormitory student)  
• Parental Notification  
• College-Level disciplinary action |
| Possession or use of alcohol or other drugs, including prescription drugs, in violation of HTC policy or federal, state, or local law in a manner involving aggravated circumstances (e.g. actual/potential harm to self or others, disruption of the HTC community, repeated offenses) | • Warnings  
• Disciplinary Probation  
• Mandatory counseling and treatment  
• College-Level disciplinary action | • Disciplinary Probation  
• Mandatory counseling and treatment  
• Service to the college community  
• College-Level disciplinary action |
| Distribution or intent to distribute a controlled substance, including improper distribution of prescription drugs, in violation of HTC policy or federal, state, or local law | • Legal action  
• College-level disciplinary actions | • Legal action  
• College-level disciplinary action |

Each faculty and staff member of HTC is expected to abide by HTC's policies for maintaining a drug-free workplace. The policy statement on drug abuse pertaining to students also applies to faculty and staff. Furthermore, all faculty and staff are required to notify the appropriate Dean of any criminal conviction relating to his or her own drug activity within five (5) days of such conviction. Faculty and staff (part-time or full-time) who violate HTC policies on drugs and controlled substances may be subject to disciplinary sanctions.

In both cases for students and faculty and staff, the existence of a progressive system of disciplinary sanctions measures does not preclude HTC from levying a heavy sanction, without first resorting to a lesser sanction. By way of illustration and not exclusion, HTC may expel a student or terminate a staff or faculty member for a violation of policy without first issuing a
warning or putting that student or employee on probation. The following regulations apply to students, faculty and staff of HTC:

The consumption of alcoholic beverages by individuals under the age of 21 is illegal.

All persons are prohibited from consuming alcoholic beverages on the premises of HTC (unless at an event specifically sanctioned by HTC Administration in writing), or entering or remaining on HTC premises in an impaired state.

Alcoholic beverages may not be served to HTC students as part of College-sponsored events or non-official activities connected with the College - except for sacramental purposes, and then only under faculty supervision.

Students who meet the legal criteria for purchase of alcoholic beverages in Illinois may request permission from the Residence Supervisor or Dean to bring sacramental wine into the residence hall for Sabbath and/or holidays. Permission is granted only when the Residence Supervisor or Dean is confident that the beverage is consistent with the dictates of Jewish law and will be used for ritual purposes only by individuals conforming to State of Illinois criteria for the possession of alcohol.

Any student, who falsely represents himself/herself at a sanctioned HTC event as being of age to consume alcohol, may be subject to disciplinary action as outlined in Personal Conduct Policy. Any faculty and/or staff member of HTC who provides alcohol to a minor on HTC premises shall be subject to full penalty under the laws of Illinois. Forcing any student or faculty member to consume alcohol and/or drugs for the purpose of initiation into or affiliation with any HTC sanctioned organization is not permitted.

Alcoholism, while it may be a disability, does not excuse any faculty and/or staff member of HTC from violating a legitimate HTC policy or neglecting their responsibilities to HTC. Individuals whose work performance is impaired as a result of the use/abuse of alcohol may be required to participate in an appropriate evaluation/treatment program and may, in certain circumstances, lead to sanctions against that individual.

If you are an alcoholic, you may self-identify to the Dean on your campus or your supervisor, as the case may be, and request confidential counseling and/or referral services to help with your problems. All inquiries and requests for assistance will be handled with strict confidentiality.

Substance Abuse Self-Identification and Amnesty
HTC recognizes that, sometimes, there may be health or safety emergencies related to the use of drugs or alcohol in which the potential for disciplinary action by HTC may deter students who want to seek assistance for themselves or for another member of the HTC community. In such instances, the health and safety of the at-risk student will be HTC’s top priority. Therefore, should a student, or another individual on behalf of that student, voluntarily come forward seeking assistance in a situation involving the over-consumption or abuse of drugs and/or alcohol, HTC’s student conduct response to the over-consumption/abuse will be, first and foremost, focused on medical treatment, counseling, and/or educational interventions. However,
HTC reserves the right to address any associated acts that compromise the well-being of its community and its members, such as harassment, violence, damage, harm to self or others, or distribution of illegal substances, on a case-by-case basis as deemed appropriate and necessary.

**Reporting a Personal Concern**

Students who have concerns about their use of alcohol and/or other drugs, or students who are concerned of such use by a friend are encouraged to seek assistance through one of HTC’s support services. Confidentiality in these circumstances may be protected in compliance with HTC policy and applicable law (e.g. FERPA, HIPPA, etc.).

Know the signs of substance abuse:
- Passed out or difficult to awaken
- Cold, clammy, pale or bluish skin
- Slowed breathing
- Vomiting (asleep or awake) Know how to help:
  - Turn a vomiting person on his/her side to prevent choking
  - Clear vomit from the mouth
  - Keep the person awake
  - NEVER leave the person unattended

**Substance Abuse Counseling**

Many different mutual and self-help programs are available near HTC campuses. Although most programs are abstinence-based and follow the 12-step approach, there are also programs that support moderation and a goal and/or do not use 12 steps. Some of the programs listed below may have a religious affiliation; others may merely use spirituality as part of the program. Meeting times and locations are available upon contacting the corresponding phone numbers or websites. Each meeting is somewhat different from any other, even within the same program, both in terms of structure and participants. Many people find it helpful to explore different options.

**United States**

National Drug & Alcohol Treatment Referral Service:
Phone: 800-662-4357

Alcoholics Anonymous:
Phone: 312-346-1475
Website: www.chicagoaa.org

Focus on Recovery:
Phone: 800-234-0420

Marijuana Anonymous:
Phone: 800-766-6779
Website: www.marijuana-anonymous.org
Cocaine Anonymous:
Phone: 310-559-5833
Website: www.ca.org

Narcotics Anonymous:
Phone: 708-848-4884
Website: www.chicagona.org

Al-Anon:
Phone: 773-471-0225
Website: www.niafg.com

Illinois Department of Human Services
Phone: 800-843-6154
Website: http://www.dhs.state.il.us/page.aspx?item=29725

Israel
Narcotics Anonymous:
Phone: 972-50-5947837
Website: http://www.naisrael.org.il/

Retorno International Recovery Group:
Phone: 718-210-9755
972-52-436-9888
Email: Soshana@retorno.org
Website: www.retorno.org

Malkishua Drug Rehabilitation Center:
Phone: 972-46488222
Email: malikishua@malikishua.org.il
Website: http://www.malkishua.org.il
http://www.malkishua.org.il/eng/ (English version)

If you would like to view the complete HTC Policy on Drugs and Controlled Substances it can be found as Appendix A of this ASR.

SMOKE FREE ENVIRONMENT
The Smoke-Free Illinois Act requires that educational institutions, among other public places and places of employment, be smoke-free inside and within 15 feet of entrances, exits, windows that open, and ventilation intakes. Under this Act, HTC prohibits smoking as defined below, including electronic smoking devices and hookahs, in all of its in-door public areas and classrooms, including but not limited to college housing, lobbies, libraries, lounges, bathrooms, conference rooms, and offices. No smoking shall be permitted within 15 feet of entrances, exits, windows that open, and ventilation intakes of any HTC facility. Violation of this policy may result in official reprimand; and if the violation persists or is repeated may result in expulsion.
Definitions
“Smoking” means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette, or pipe, or any other lighted or heated tobacco or plant product intended for inhalation, including hookahs and marijuana, whether natural or synthetic, in any manner or in any form. “Smoking” also includes the use of an electronic smoking device which creates an aerosol or vapor, in any manner or in any form, or the use of any oral smoking device for the purpose of circumventing the prohibition of smoking in this policy.

“Electronic Smoking Device” means any product containing or delivering nicotine or any other substance intended for human consumption that can be used by a person to simulate smoking through inhalation of vapor or aerosol from the product. The term includes any such device, whether manufactured, distributed, marketed, or sold as an e-cigarette, e-cigar, e-pipe, e-hookah, or vape pen, or under any other product name or descriptor.

“Hookah” means a water pipe and any associated products and devices which are used to produce fumes, smoke, and/or vapor from the burning of material including, but not limited to, tobacco, shisha, or other plant matter.

WEAPONS & FIREARMS POLICY
In accordance with Illinois law, concealed weapons are prohibited on and within property of institutions of higher education. Hebrew Theological College expands the law to include prohibiting possession or carrying of weapons, firearms, or explosions; and possession or use of fireworks, ammunition, airguns, airsoft, or other weapons such as knives, tasers, swords, billy clubs, throwing stars, and nunchucks.

REAUTHORIZATION OF VIOLENCE AGAINST WOMEN’S ACT OF 2013
In accordance with the Reauthorization of Violence Against Women’s Act of 2013 (“VAWA”) Hebrew Theological College prohibits incidents of domestic violence, dating violence, sexual assault and stalking. Faculty, staff or students who are a victim of one of these crimes are provided the following options for emergency response, reporting, grievance/ adjudication and support services.

SEXUAL AND GENDER VIOLENCE
Defining Rape and Sexual Assault
This policy applies to all members of the HTC community, including students, faculty, and administrators as well as third parties (including, but not limited to, vendors, invitees, etc.). Discrimination or harassment of any kind in regards to a person’s sex including sexual assault (i.e. rape, fondling, incest or statutory rape), domestic violence, dating violence, and stalking, is not tolerated at our institution. Information and/or training regarding this policy are available to students, faculty, and staff.

HTC promotes an environment in which the dignity and worth of all members of the community are respected. It is the policy of HTC that sexual intimidation of students and employees is unacceptable behavior and will not be tolerated. HTC will not tolerate unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature constituting sexual harassment or sexual assault (i.e. rape, fondling, incest or statutory rape).
In general, it is a sex crime to engage in any sexual contact with a person who does not affirmatively consent, or to engage in sexual intercourse, deviant sexual intercourse, or sexual abuse if it is accomplished by forcible compulsion. Illinois state law also defines these acts as crimes if any of them are engaged in with a person who is incapable of consent either because of the person's age or because the person is mentally incapacitated, or physically helpless. Therefore, sexual abuse, sexual assault, and rape are sex crimes and violators will be prosecuted in accordance with Illinois state law.

All divisions of HTC seek to foster a collegial atmosphere where students are nurtured and educated through close faculty-student relationships, student camaraderie, and individualized attention.

Discrimination or harassment of any kind, including sexual assault (i.e. rape, fondling, incest or statutory rape), domestic violence, dating violence, and stalking, is anathema to HTC’s mission, history, and identity. HTC will resolve any identified discrimination in a timely and effective manner, and will ensure that it does not recur. Compliance with HTC’s policies and procedures is a necessary step in achieving a safe environment in our educational community. The policies set forth were developed to promote a safe educational environment in compliance with the Violence Against Women Act (VAWA) and a high quality campus life.

Those believing that they have been harassed or discriminated against based on their sex, including sexual harassment or sexual assault (i.e. rape, fondling, incest or statutory rape), should immediately contact the Title IX coordinator. When HTC has notice of the occurrence, HTC is compelled to take immediate and effective corrective action reasonably calculated to stop the harassment, prevent its recurrence, and as appropriate, remedy its effects.

If you would like to review the complete policy, it can be found in Appendix B of this ASR.

**Title IX Coordinator**
The Title IX Coordinator or his/her designee (“Title IX Coordinator”) is trained and knowledgeable about enforcement, compliance, communication, and implementation of HTC’s anti-harassment policy.

HTC’s Title IX Coordinator’s contact information is as follows:

Cheryl Karp
Title IX Coordinator
7135 N. Carpenter Road
Skokie, Illinois 60077
Phone: 847-982-2500
Email: karp@htc.edu
Crime Prevention Education & Awareness Is Provided As Follows

- During student orientation
- During employee orientation
- Upon request by location
- As a result of trends identified

Crime Prevention Surveys are conducted by your resident precinct or local law enforcement upon request. In addition, HTC takes personal security issues seriously, and engages in an ongoing process of improving systems as they are implemented.

Rape & Sexual Violence

Sexual Assault/Improper Sexual Conduct is a criminal offense pursuant to the Penal Law. If a member of HTC community engages in improper sexual conduct, it may result in the severest disciplinary sanctions available to HTC. HTC will cooperate fully with Law Enforcement authorities should the victim seek criminal prosecution. HTC also recognizes that confidentiality is most important to victims of sex crimes.

While complete confidentiality cannot be guaranteed, every effort will be made to maintain confidentiality on a “need to know basis.” The victim’s wishes not to report a sexual assault to the police will generally prevail, but HTC reserves the right to notify the police when it is believed that such reporting is necessary for the protection of others.

All reports of Rape and Sexual Violence must be investigated by the Title IX Coordinator. Any reports made to a member of the pastoral care or clinical services provider on campus must be reported for statistical purposes only.

Indicators/Signs of Stalking Behavior

- Persistent phone calls despite the fact that you have told the person not to contact you in any form.
- Someone waiting at or outside your workplace, residence, or school.
- Overt threats.
- Manipulative behaviors (i.e. stating that they will hurt themselves).
- Sending written messages, letters, emails, graffiti, etc.
- Sending of gifts.
- Defamation.

If You Become A Victim Of A Stalker, Do Not Take It Lightly:

- Notify the Dean, Mashgiach Ruchani, or Menahel Ruchani at your location. Even if the problem is not campus/site related, they can assist you with reporting the problem to the local law enforcement agency.
- Apply for a restraining order. If you already have one, file a copy with the office on your campus.
- Document everything. Even if you have decided not to go the legal route, you may change your mind. Keep answering machine recordings, letters, gifts, etc. Keep a log of drive-bys or any suspicious occurrences.
- Have co-workers screen all calls and visitors.
• Do not accept packages unless they were personally ordered.
• Do not destroy discarded mail.
• If you think you are being followed, go to the nearest police station or public place.
• Never be afraid to sound your horn to attract attention.
• Do not be ashamed and think you caused this. Instead tell everyone you know that you are being stalked, from neighbors, to co-workers, to classmates so that no information about you is provided to the stalker.
• Tell the stalker NO once and only once, and never give him/her satisfaction of a reaction again.

Preserve any evidence that may help you obtain College help through no-contact orders, or court assistance with restraining orders. For help with this, contact the local police or Security right away. Some examples of evidence preservation include:
• Preserving any email, texts, or electronic messages on social media.
• Photographing any threatening messages that are not electronic.
• Asking friends to witness any overt behaviors such as being followed.
• Keeping a journal of stalking events.

If You Are Being Sexually Assaulted
• Keep your head. Stay as calm as possible, think rationally and evaluate your resources and options.
• Be realistic about your ability to protect yourself. Yelling, hitting, or biting may give you a chance to escape, but be aware it can also expose you to further harm.
• Passive resistance such as vomiting, urinating, or telling the attacker that you are ill or menstruating is another option.
• Knowing self-defense can help you to overcome fear and think clearly in emergencies.
• Do not try to defeat the attacker. Just get away as fast as you can. There is no right way to respond to an attack. If you escaped alive, you responded in the right way.

If You Have Been Sexually Assaulted
• You must NEVER BEAR the RESPONSIBILITY for being assaulted. Responsibility for the crime lies with the rapist alone.
• If possible do not shower, bathe, brush your teeth eat, drink, smoke, urinate or change your clothes.
• Do not disturb anything in the area where the assault occurred.
• Get immediate medical attention. An exam may reveal the presence of a physical injury. Following a sexual assault, antibiotics are typically given at the time of the exam to help prevent the victim from acquiring certain sexually transmitted diseases. A urine test conducted within 96 hours can determine if a drug was used.
• Write down a description of the assault, circumstances, and the attacker.
• Many police departments now have special victims units that are specially trained to deal with rape and/or sexual violence victims. In addition, many hospitals also have rape crisis units.
• Reporting the assault is an important step in ending this violence. You should feel comfortable with your decision.
Call someone to be with you. You should not be alone. Contact a rape crisis center to help you deal with the aftermath.

**If Someone You Know Is a Victim of an Assault**
- See that they have a safe place to stay and will stay with someone.
- Give the victim your emotional support. Let them express their feelings. Do not pry into details.
- Do not be judgmental, instead listen, and provide understanding.
- Rape and/or sexual violence are never the victim’s fault. Do not let them blame themselves or think that they did something to cause the attack.
- Encourage the victim to get medical attention, contact a rape crisis center, and report the incident. Help the victim explore their options but let them make the decision.
- Point out that since they are still alive they have achieved a major victory.

**Bystander Awareness**
- Don’t turn a blind eye.
- If you are attending a social gathering with a friend, remember the same principles apply in every scenario.
- Be mindful of your friend(s) and make sure you come and go together and if you don’t leave together that your friend(s) is/ are able to make decisions for himself/herself/themselves.
- If you see someone at risk, get involved.
- Don’t wait for someone else to take an action.
- Be honest and directly talk about the consequences of their actions.
- Solicit help from other bystanders.
- If the person is your friend, communicate by either asking the person “Are you okay,” “Is he/she bothering you,” etc.
- Give the person an out like calling their cell phone or distracting the other person.
- If it doesn’t feel safe to say something, you can call the police or any other person of authority.

Don’t let resentment prevent you from stepping in.

**Victim Assistance**
In cases of rape and/or sexual violence, there are many sources of support available to victims.

**On Campus**
- The Dorm Supervisor or *Eim Bayit* is available to work with the HTC community to meet immediate needs.
- HTC staff members are available to provide support and escorts around campus and in certain instances to assist the individual in getting home.
- Other available community resources may be provided based on student’s individual needs.
Off Campus

ILLINOIS

Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080

Chicago Domestic Violence Line: (877) 863-6338

Evanston Domestic Violence Line (YWCA): (877) 718-1868

Rape Victim Advocates
Main Office: 180 N. Michigan Ave, Suite 600, Chicago
(312) 443-9603
www.rapevictimadvocates.org

Chicago Metro Rape Crisis Hotline (YWCA)
Evanston 1215 Church St, Evanston
(847) 864-8445
www.ywca.org/evanston

Evanston Victim Services Program Evanston Police Department
1454 Elmwood Avenue, Evanston
http://www.cityofevanston.org/police/aboutus/police-social-services

Porchlight Counseling Services
(773) 750-7077 (confidential helpline and intake)
http://www.porchlightcounseling.org

National
• www.womenslaw.org
  • (707) 784-6844
• www.rainn.org
  • (800) 656-HOPE (4673)

ISRAEL
• www.1202.org.il/English/
  • +972-2- 623 2451

Sex Offender Registration – Campus Sex Crimes Prevention Act

HTC must make available to the public over the Internet information about certain sex offenders required to register under Megan's Law.

These sex offender Internet registry laws can be found at the following addresses:
Israel does not have a sex offender registry accessible to the public. There are specific vocational restrictions for sex offenders.

**EMERGENCY ACTIONS IN RESPONSE TO VIOLENCE**

Individuals who have experienced an act of violence, such as domestic violence, dating violence, sexual assault and/or stalking requiring immediate emergency assistance are advised to take the following actions:

- Get to a place of safety. Dial 911 for local Police or Dorm Supervisor (Skokie Campus)/ Eim Bayit (Chicago Campus) immediately if at continued risk.
- Seek any necessary medical attention as soon as possible.

Nearby hospitals include:

**Evanston Hospital**
2650 Ridge Avenue
Evanston, IL 60201
(847) 570-2000

**Skokie Hospital**
9600 Gross Point Road
Skokie, IL 60076
(847) 677-9600

**Presence Saint Francis Hospital**
355 Ridge Avenue
Evanston, IL 60202
(847) 316-4000

**Swedish Covenant Hospital**
5145 N California Ave
Chicago, IL 60625
(773) 878-8200

Going to an Illinois hospital for medical care after an incident of sexual violence does not obligate an individual to file a report with the College or the police.

*Reporting Incidents of Relationship Violence*

Upon addressing the immediate safety needs, individuals have multiple options for reporting incidents of relationship violence, depending on their comfort level and confidentiality needs. Students reporting incidents of sexual misconduct, to include sexual assault; sexual harassment; dating violence, domestic violence and stalking of a sexual nature, may contact:

**Title IX Coordinator**
Cheryl Karp
7135 N. Carpenter Road
Skokie, Illinois  60077
(847) 982-2500
karp@htc.edu

*Options to File a Grievance*

A victim of any criminal act, to include domestic violence, dating violence, stalking and or sexual assault has the option to pursue a criminal complaint with the police and if requested may be assisted by campus personnel to make the call. If the victim and the accused are both affiliated
with the College, a complaint of sexual misconduct may be pursued through the College or through both processes consecutively or concurrently. Regardless of the option, the College will promptly initiate an investigation of domestic violence, dating violence, sexual assault and stalking in a prompt comprehensive manner consistent with the obligations identified in VAWA and the College’s Title IX Policy.

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

This policy applies to all members of the Hebrew Theological College community, including students, faculty, and administrators as well as third-parties (including, but not limited to, vendors, invitees, etc.). Discrimination or harassment of any kind in regards to a person's gender is not tolerated at our institution. Information and/or training regarding this policy are available to students, faculty, and staff. In addition, information about this policy is available on Hebrew Theological College’s website.

All divisions of Hebrew Theological College seek to foster a collegial atmosphere where students are nurtured and educated through close faculty-student relationships, student camaraderie, and individualized attention. Discrimination or harassment of any kind is anathema to Hebrew Theological College's mission, history, and identity. Hebrew Theological College will resolve any identified discrimination in a timely and effective manner, and will ensure that it does not recur. Those believing that they have been harassed or discriminated against on the basis of their gender, including sexual harassment, sexual violence, domestic violence, dating violence, and stalking should immediately contact the Title IX coordinator (see below). When Hebrew Theological College has notice of the occurrence, Hebrew Theological College is compelled to take immediate and effective corrective action reasonably calculated to stop the harassment, prevent its recurrence, and as appropriate, remedy its effects.

Definitions

Discrimination and Harassment

Title IX, and its implementing regulations, prohibit discrimination based on sex, including sexual harassment. The prohibition against discrimination extends to employees and third-parties. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;

b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or
sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

In the case of Title IX, sexual harassment is conduct that is sexual in nature, is unwelcome, and denies or limits an individual’s ability to participate in or benefit from a school’s educational program and/or activities, and is based on power differentials (quid pro quo), the creation of a hostile environment or retaliation. Sexual harassment can take different forms depending on the harasser and the nature of the harassment. The conduct can be carried out by school employees, other students, and non-employee third parties, such as a visiting speaker. Both male and female students can be victims of sexual harassment, and the victim can be of the same sex. The conduct can occur in any school program or activity and can take place in school facilities, or at other off-campus locations, such as a school-sponsored activity or training program at another location. The conduct can be verbal, nonverbal or physical. The following are examples of potential violations of Title IX related policy: making sexual propositions or pressuring students or employees for sexual favors; touching of a sexual nature; writing graffiti of a sexual nature; displaying or distributing sexually explicit drawings, pictures, or written materials; performing sexual gestures or touching oneself sexually in front of others; telling sexual or dirty jokes; spreading sexual rumors or rating other students as to sexual activity or performance; circulating or showing emails or Web sites of a sexual nature. Violations may also occur in any form: written/print, physical, verbal or electronically through email, text, or posting to social media or other online site of any kind.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that

a) has the purpose or effect of creating an intimidating, hostile or offensive work environment;

b) has the purpose or effect of unreasonably interfering with an individual's work performance; or

c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

Consent

Consent is defined as a freely given agreement to sexual activity. Note the following:

- A person's lack of verbal or physical resistance or submission resulting from the use or threat of force does not constitute consent.
- A person's manner of dress does not constitute consent.
• A person's consent to past sexual activity does not constitute consent to future sexual activity.
• A person's consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another,
• A person can withdraw consent at any time.
• 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 circumstances, including but not limited to the following:
  o the person is incapacitated due to the use or influence of alcohol or drugs;
  o the person is asleep or unconscious;
  o the person is under age; or
  o the person is incapacitated due to a mental disability.

Retaliation

Retaliation is any kind of reprisal, adverse action, or negative action taken against an individual because he or she has: (1) complained about alleged discrimination or harassment as defined above, (2) participated as a party or witness in an investigation relating to such allegations, or (3) participated as a party or witness in a proceeding regarding such allegations. Retaliation can occur contemporaneously during the complaint process or subsequent to it, once the retaliator is aware of the recipient's participation in the process. Retaliation does not exist in the absence of an adverse action. An individual is protected from retaliation even when the complaint at issue is ultimately found to lack merit, as long as the complaint was made in good faith.

Hebrew Theological College does not allow, nor tolerate any conduct by any Hebrew Theological College community member that may be regarded as retaliatory. Retaliation against any individual, whether said person submitted a complaint through the method described below, or for any other reason will not be tolerated.

Contact Information

Title IX Coordinator

The Title IX Coordinator or his designee ("Title IX Coordinator") is trained and knowledgeable about enforcement, compliance, communication, and implementation of Hebrew Theological College's anti-harassment and anti-discrimination policy.

The Title IX Coordinator's contact information is as follows:

Cheryl Karp
Title IX Coordinator
Hebrew Theological College
7135 N. Carpenter Road
Skokie, Illinois 60077
Phone: (847) 982-2500 x1150
Email: karp@htc.edu
Police/Emergency Services

Many police departments now have special victims units that are specially trained to deal with rape and/or sexual violence victims. In addition, many hospitals also have rape crisis units. To report a sexual assault to the police, dial 911.

Sexual Assault Crisis Centers/Hotlines

- Evanston Domestic Violence Line (YWCA): (877) 718-1868
- Rape Victim Advocates: (312) 443-9603
- Porchlight Counseling Services: (773) 750-7077 (confidential helpline and intake)

Confidentiality

Hebrew Theological College has independent obligations to report or investigate potential misconduct, even if a complainant does not wish to initiate an official process. Therefore, absolute confidentiality cannot be promised with respect to a complaint of discrimination, harassment, sexual harassment, or retaliation received either through Hebrew Theological College's compliance hotline or otherwise. The phone number for the Hebrew Theological College hotline is (646) 565.6330. Hebrew Theological College wishes, however, to create an environment in which legitimate complaints are encouraged, while also protecting the privacy of all involved in an investigation. Complaints about violations of these policies will therefore be handled in strict confidence, with facts made available only to those who need to know in order for Hebrew Theological College to promptly and thoroughly investigate and resolve the matter.

Procedures & Implementation

Duty to Report Violations

Any member of the Hebrew Theological College community including students, faculty, employees, and third-parties have a duty to report violations of this policy where individuals know, or should know, of accusations or actions which violate Hebrew Theological College Policy and will notify the Hebrew Theological College Title IX Coordinator of such violations promptly.

At the discretion of Hebrew Theological College administration, students who report a violation of this policy to a responsible employee may be granted immunity and not subjected to disciplinary actions for violating Hebrew Theological College’s Code of Conduct or any similar policies by engaging in activities such as underage drinking.

Formal Investigation and Resolution of Discrimination, Harassment, Sexual Assault or Retaliation Complaints

Duty to Cooperate and Facilitate

All members of the Hebrew Theological College community are required to cooperate fully with any investigation of discrimination, harassment or sexual assault (i.e. rape, fondling, incest or statutory rape). A faculty member, staff member, or student who has relevant information and refuses to cooperate with an ongoing investigation will be subject to disciplinary action for, among other things, violations of the Hebrew Theological College Code of Conduct and/or insubordination. Likewise, all Hebrew Theological College employees are required to ensure that
complaints about discrimination, harassment, or retaliation are directed to the appropriate administrative office for evaluation and investigation. Hebrew Theological College is committed to conducting an inquiry that is thorough, prompt and impartial.

Complaint Process

Complaints concerning sexual harassment sexual discrimination and/or sexual assault (i.e. rape, fondling, incest or statutory rape) should be sent to Cheryl Karp, Title IX Coordinator, 7135 N. Carpenter Road, Skokie, Illinois 60077, via email karp@htc.edu or by telephone (847) 982-2500 ext. 1150. The HTC Title IX Coordinator will respond within twelve (12) hours to a report received electronically. Complaints can be made confidentially and anonymously by calling (646) 565.6330.

Complaints should be filed as soon as possible after the date of the alleged misconduct, and a written complaint is preferable.

A complaint, which must be submitted within the later of the following two dates: (a) thirty (30) days after the alleged misconduct; or, (b) the end of the semester in which the alleged incident occurred.

While prompt reporting is expected, complaints older than 30 days will be processed. However, if more than 365 days have elapsed since the day of the complaint, the complaint may not be processed. Every effort is made to conduct a thorough and speedy investigation. Several factors may impact Hebrew Theological College’s ability to conduct a prompt investigation, including, but not limited to: the Complainant’s accessibility or unresponsiveness, witness availability or unresponsiveness, the number of witnesses, the timing of the investigation (i.e. if an investigation is being conducted at a time when students are taking final exams or on recess), etc.

HTC will cooperate fully with Law Enforcement authorities should the victim seek criminal prosecution. HTC also recognizes that confidentiality is most important to victims of sex crimes. While complete confidentiality cannot be guaranteed, every effort will be made to maintain confidentiality on a “need to know basis.” The victim’s wishes not to report a sexual assault to the police will generally prevail, but HTC reserves the right to notify the police when it is believed that such reporting is necessary for the protection of others.

Intake Interview

After receipt of a complaint, the Title IX Coordinator or his/her designee will meet with the complainant as soon as possible, usually within one week, but not later than thirty (30) days after receipt. The complainant must make himself/herself available to meet.

The meeting will be an intake interview where the Title IX Coordinator or his/her designee will inform the complainant about the investigation procedure and timeline. The complainant may sign a formal complaint form at that time (under the above guidelines) if he/she has not already done so. A complaint will proceed even in the absence of a signed written complaint.

Complaints about Students, Faculty, Other Employees or Third Parties

Upon receipt of a complaint, the Title IX Coordinator or his/her designee, shall investigate the circumstances of the complaint. The Complainant will be given clear information concerning their rights and options outlined in this policy.
This investigation will include documented interviews of the complainant, the person against whom the complaint is written, and witnesses with relevant knowledge, if any. Further, the investigation will include a review of relevant documents and any other evidence.

The proceeding will be consistent with HTC’s policies and transparent to both the accuser and the accused. Both accuser and accused will receive timely notice of meetings at which either accuser, accused, and/or others may be present. Both accuser and accused will receive timely and equal access to information that will be used during formal and informal disciplinary meetings or hearings.

The Title IX Coordinator shall have thirty (30) days from the intake interview to complete the investigation of the event in question. Such thirty (30) days may be extended in the event that one of the following occurs:

- Availability or unavailability of a witness or relevant/material documents;
- Recalcitrance of a witness and/or any necessary party;
- Delay or other uncooperative actions of any necessary party;
- High number of witnesses;
- Holidays and vacation periods;
- Any other unforeseeable events/circumstances.

Generally speaking an investigation will take less than 60 calendar days following receipt of the complaint. This may not be practicable in every investigation and may vary depending on the complexity of the investigation and the severity and extent of the harassment or sexual assault. The Title IX Coordinator shall report the findings of the investigation to a designated, impartial Fact Finder. The Fact Finder shall endeavor to issue a determination within fifteen days after receipt of the investigation file to determine and detail: (a) whether there is probable cause to believe discrimination occurred with respect to each allegation in the complaint, (b) a description of actions taken, if any, to prevent similar problems from occurring in the future, and (c) the proposed resolution of the complaint. Both parties will be informed of the outcome reached and sanctions imposed as a result of such investigation and determination.

Preponderance of the Evidence

The greater weight of evidence in an investigation meaning that one party’s evidence outweighs the evidence of the other.

Notice of Determination and Further Action

Both the complainant (the party who filed the complaint or the alleged target of the sexual harassment or sexual assault) and the respondent (the accused) shall be informed of the Fact Finder's decision within seven days of the conclusion of the Fact Finder’s deliberation. Please refer to Section 4.0 for the policies regarding the confidentiality of this determination.

Potential sanctions include, but are not limited to:

- Written warnings
- Loss of privileges
- Mandatory training or counseling
- No-contact order

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• Removal from campus housing
• Probation
• Suspension
• Expulsion

Sanctions for faculty or staff members include, but are not limited to:
• Written warnings
• Loss of privileges
• Mandatory training or counseling
• Probation
• No-contact order
• Suspension
• Demotion
• Loss of annual pay increase
• Termination of employment, including revocation of tenure.

At the time of the receipt of this notice both parties will be informed of any actions or precautions that will be taken in response to the decision. Questions concerning these further actions should be addressed to the Title IX Coordinator Cheryl Karp or the appropriate office as required by the Fact Finder's decision.

Appeal Process

Both the complainant and the respondent are eligible to file an appeal to the determination based on (i) a procedural error occurred, (ii) new information exists that would substantially change the outcome of the finding, or (iii) the sanction is disproportionate with the violation.

The request for an appeal, including the grounds upon which the request is based, should be submitted in writing to the Title IX Coordinator within seven (7) business days following the date on the outcome letter. The Appeal should state the remedy sought by the appealing party. Each party may respond in writing to any appeal submitted by the other party. Written responses to the other party’s appeal must be submitted within three (3) business days following delivery of the notice of the written appeal. Written requests for appeal submitted by one party will be shared with the other party.

Appeals will be conducted in an impartial manner by trained College officials without conflict of interest or bias for or against either party. A party with a concern about a conflict of interest or bias should contact the Title IX Coordinator. The Appeals Panel can determine whether a change in the decision is warranted. If applicable, both the accuser and accused will have an opportunity to be present or have others present during any disciplinary proceedings. If a change in this decision is necessary, the Appeals Panel will review the appeal and rationale and make a final decision. Both parties will be informed of the outcome reached and sanctions imposed as a result of such proceedings.

Appeals will not be reviewed or considered beyond the Appeals Panel. Appeals decisions will be rendered within twenty (20) business days after the receipt of the formal request for appeal. The appeal decision will be provided in writing to both parties and the appeal decision is final.
Discipline
Employees, faculty and students who violate Hebrew Theological College’s policies may be subject to disciplinary action. Individuals who retaliate against someone who files a complaint, or against a witness, representative, or advocate for a complainant, will be subject to further disciplinary action. Consistent with this Policy Hebrew Theological College will take prompt effective action to resolve any identified discrimination, and take steps to avoid a reoccurrence.

Availability of Confidential Counseling
As required under Title IX, Hebrew Theological College through its investigations and/or Title IX Compliance officer will offer its internal confidential counseling services to any complainant who has begun the complaint process. It is ultimately complainant’s decision of whether or not to accept the counseling service offered by Hebrew Theological College.

Interim Measures
Hebrew Theological College endeavors to accommodate all reasonable requests for interim protective measures, including but not limited to changes to academic, living, dining, transportation and working conditions and obtaining and enforcing any type of protective order.

External Reporting
The nearest medical facilities that provide medical forensic examinations at no cost to the survivor (pursuant to the Sexual Assault Survivors Emergency Treatment Act of Illinois) are as follows:

Chicago Campus
Presence Saint Francis Hospital
355 Ridge Avenue
Evanston, IL 60202
847.316.400

Skokie Campus
NorthShore University HealthSystem - Skokie Hospital
9600 Gross Point Road
Skokie, IL 60076
847.933.6950

Victim Assistance
In cases of rape and/or sexual violence, there are many sources of support available to victims.

On Campus
- The Dorm Supervisor or Eim Bayit is available to work with the HTC community to meet immediate needs.
- HTC staff members are available to provide support and escorts around campus and in certain instances to assist the individual in getting home.
- Other available community resources may be provided based on student’s individual needs.
ILINOIS

- Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080
- Chicago Domestic Violence Line: (877) 863-6338
- Evanston Domestic Violence Line (YWCA): (877) 718-1868
- Rape Victim Advocates
  Main Office: 180 N. Michigan Ave, Suite 600, Chicago
  (312) 443-9603
  www.rapevictimadvocates.org
- Chicago Metro Rape Crisis Hotline (YWCA)
  Evanston 1215 Church St, Evanston
  (847) 864-8445
  www.ywca.org/evanston
- Evanston Victim Services Program Evanston Police Department
  1454 Elmwood Avenue, Evanston
  http://www.cityofevanston.org/police/aboutus/police-social-services
- Porchlight Counseling Services:
  (773) 750-7077 (confidential helpline and intake)
  http://www.porchlightcounseling.org

NATIONAL

- www.womenslaw.org
  - (707) 784-6844
- www.rainn.org
  - (800) 656-HOPE (4673)

Members of the Hebrew Theological College community are always subject to local, state, and federal laws, and nothing in these procedures is intended to limit or postpone the right of an individual to file a complaint or charge with appropriate federal, state, or local departments or agencies.

Among other options, students may contact the Office for Civil Rights of the U.S. Department of Education for inquiries concerning the application of Title IX as well as the implementation of its regulations. The Office for Civil Rights can be contacted using the following information:

Chicago Office
Office for Civil Rights
U.S. Department of Education, Citigroup Center
500 W. Madison Street, Suite 1475
Chicago, IL 60661-4544
Telephone: 312-730-1560
Email: OCR.Chicago@ed.gov
ANTI-DISCRIMINATION POLICY
Hebrew Theological College admits students to all of the rights, privileges, programs and other activities generally accorded or made available to students at the college or the Extension Division without regard to their race, creed, color, age, sex, national origin, or disability/handicap.

CRIME LOG
The College maintains a database, which archives all crimes reported to the department, except when disclosure of such information is prohibited by law or such disclosure would jeopardize the confidentiality of the victim. Information may be temporarily withheld if release of such information would: (a) jeopardize an ongoing criminal investigation or the safety of an individual; (b) cause a suspect to flee or evade detection; or (c) result in the destruction of evidence. The crime log data consists of the nature, date, time and general location of the crime and the disposition of the complaint, if known.

TIMELY WARNING OF CRIMINAL ACTIVITY
In accordance with the Clery Act, the College will generate a Campus Safety Alert upon receiving notification from a College member or the Police of a crime that is occurring in or around our campus buildings that represents an ongoing or a continuous threat to the College Community.
CRIME STATISTICS CATEGORIES AND RECORDING MEASURES
Statistical crime data is provided for the past three calendar years in accordance with the federal laws articulated in the Clery Act. Data included in the statistics column for Murder/ Non Negligent Manslaughter, Negligent Manslaughter, Domestic Violence, Dating Violence, and Stalking, Sex Offenses, Aggravated Assault, Larceny / Theft, Intimidation, Simple Assault, Vandalism and Motor Vehicle Thefts represent the number of victims in the crime occurrence. Similarly, cases involving arrests for Liquor Law, Drug Law and Illegal Weapons violations are recorded per person. Statistics captured under “Referred for Disciplinary Action” reflect the number of individuals in a reported incident submitted to a campus official authorized to administer and maintain a record of a disciplinary action. Statistics recorded for Robbery, Burglary and Arson indicate the number of occurrences only.

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<th>2015</th>
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HATE CRIMES STATISTICS

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Note: There were no Hate Crimes reported during the years 2013 and 2014 on/in the Skokie Campus its residential facilities or public property.

There were no Hate Crimes reports during the years 2013, 2014 and 2015 on/in the Chicago Campus, its’ residential facilities or public property.
## ANNUAL FIRE SAFETY REPORT

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Appendix A
HEBREWS THEOLOGICAL COLLEGE DRUG AND CONTROLLED SUBSTANCES POLICY

1.0 POLICY

The United States Department of Education has issued regulations implementing the provisions of The Drug-Free Schools and Communities Act Amendments of 1989 (Public Law 101-226). In compliance with Federal Law and Illinois State Law, this policy includes information to ensure that all members of the Hebrew Theological College (“HTC”) Community are aware of the dangers of substance abuse and to outline the sanctions for violating this policy.

Hebrew Theological College prohibits the illegal and irresponsible use of alcohol and other drugs, including abuse of prescription drugs, in accordance with Halakhic authorities as well as applicable federal, state, and local laws. Students, faculty and staff who distribute or use illegal drugs or illicitly use drugs which would otherwise be legal, including alcohol, while on HTC campuses, locations and facilities, or as part of any HTC activities, are violating Federal Laws, Illinois State Laws, and the policies and procedures of HTC. Violations of federal and state laws may lead to prosecution and criminal sanctions, including, but not limited to, fines and/or imprisonment.

As an institution whose mission focuses on the religious and general education of Orthodox Jews, Hebrew Theological College is fortunate to attract only those students committed to a Torah-observant environment which is not conducive to the casual use of alcohol, illegal drugs, or the abuse of prescription drugs. However, it is incumbent upon us to be familiar with the specific policies regarding such use as well as resources for individuals affected by such addictions.

HTC may provide confidential counseling and referral services to students, faculty and staff with drug and/or alcohol problems. These services are available through the Deans, Mashgiach Ruchani, and Menahel Ruchani. All inquiries and requests for assistance will be handled with confidentiality.

2.0 PURPOSE

HTC seeks to safeguard the health and well-being of all members of HTC: students, faculty and staff. All members of HTC are accountable to know the law and to understand the policies and procedures of HTC.

3.0 PUBLIC EDUCATION STATEMENT ON ILLICIT DRUG AND ALCOHOL USE

In order to better educate students, faculty and staff, HTC wishes to provide all members of HTC with an education of the effects of substance abuse. The mind-altering substances to be discussed here are: marijuana, cocaine, heroin (and their
derivatives); amphetamines (uppers); barbiturates (downers); hallucinogens; and alcohol. Many individuals take such drugs to escape from their problems; but doing so only creates more problems.

What are some of the health problems associated with drugs?

- The most obvious problems are death or severe organ damage (such as heart attack, respiratory arrest, damage to the liver and lungs, and stroke).
- The less obvious, though much more prevalent, problems of the mind and body are as follows:
  - Marijuana: Can cause short-term effects such as slow reflexes; increase in forgetfulness; alters judgment of space and distance; aggravate pre-existing heart and/or mental health problems; long-term health effects include permanent damage to lungs, reproductive organs and brain function; Can interfere with physical, psychological, social development of young users.
  - Cocaine (Crack): Can cause short-term effects such as impaired judgment; increased breathing, heart rate, heart palpitations; anxiety, restlessness, hostility, paranoia, confusion; long-term effects may include damage to respiratory and immune systems; malnutrition, seizures and loss of brain function; highly addictive.
  - Hallucinogens (PCP, LSD, ecstasy, DXM): Can cause extreme distortions of what's seen and heard; induces sudden changes in behavior, loss of concentration and memory; increases risk of birth defects in user's children; overdose can cause psychosis, convulsions, coma and death. Frequent and long-term use can cause permanent loss of mental function.
  - Inhalants (nitrous oxide, amyl nitrite, butyl nitrite, chlorohydrocarbons, hydrocarbons): Can cause short-term effects such as nausea, dizziness, fatigue, slurred speech, hallucinations or delusions; may lead to rapid and irregular heart rhythms, heart failure and death; long-term use may result in loss of feeling, hearing and vision; can result in permanent damage to the brain, heart, lungs, liver and kidneys.
  - Opiates/Narcotics (heroin, morphine, opium, codeine, oxycodone, china white): Can cause physical and psychological dependence; overdose can cause coma, convulsions, respiratory arrest and death; long term use leads to malnutrition, infection and hepatitis; sharing
needles is a leading cause of the spread of HIV and hepatitis; highly addictive, tolerance increases rapidly.

- **Sedatives**: Can cause reduced reaction time and confusion; overdose can cause coma, respiratory arrest, convulsions and death; withdrawal can be dangerous; in combination with other controlled substances can quickly cause coma and death; long-term use can produce physical and psychological dependence; tolerance can increase rapidly.

- **Tobacco** (cigarettes, cigars, chewing tobacco): Can cause diseases of the cardiovascular system, in particular smoking being a major risk factor for a myocardial infarction (heart attack), diseases of the respiratory tract such as Chronic Obstructive Pulmonary Disease (COPD) and emphysema, and cancer, particularly lung cancer and cancers of the larynx and mouth; nicotine is highly addictive.

- **Alcohol**: Can cause short-term effects such as loss of concentration and judgment; slowed reflexes; disorientation leading to higher risk of accidents and problem behavior; long-term effects include risk of liver and heart damage, malnutrition, cancer and other illnesses; can be highly addictive to some persons.

**Warning! AIDS**: Users of needles who take any drugs run a high risk of contracting AIDS and hepatitis.

**Warning! Addiction**: This is the common denominator for all mind-altering substances. With its insidious onset, addiction often goes undetected until the user’s life is in chaos. Addiction pervades one’s life, overpowering one’s ability to reason and to relate to others. Addiction ruins the user’s life and the lives of those around him/her.

### 4.0 Disciplinary Standards for Possessing, Using, Distributing and/or Selling Drugs & Controlled Substances

For **students**:

It is the policy of HTC, as stated in the Personal Conduct policy, that the unlawful use, possession, distribution, or manufacture of drugs or controlled substances on HTC property is strictly prohibited. Individuals who possess use, distribute or manufacture drugs or controlled substances are subject to disciplinary action, including but not limited to expulsion, as well as possible criminal prosecution. Students found in violation of these policies may be subject to disciplinary
proceedings as outlined in the school catalogs and student handbooks. Student violators may be subject to the following sanctions and remedial measures:

<table>
<thead>
<tr>
<th>Nature of Violation</th>
<th>Responses for First-Time Violations May Include, But Are Not Limited To:</th>
<th>Responses for Repeat Violations May Include, But Are Not Limited To:</th>
</tr>
</thead>
</table>
| Possession or use of alcohol or other drugs in violation of HTC policy or federal, state, or local law | • Warnings  
• Disciplinary Probation  
• Counseling and treatment  
• Service to the college community | • Disciplinary Probation  
• Mandatory referral for counseling and treatment  
• Suspension from dormitory (if dormitory student)  
• Parental Notification  
• College-Level disciplinary action |
| Possession or use of alcohol or other drugs in violation of HTC policy or federal, state, or local law in a manner involving aggravated circumstances (e.g. actual/potential harm to self or others, disruption of the HTC community, repeated offenses) | • Warnings  
• Disciplinary Probation  
• Mandatory counseling and treatment  
• College-Level disciplinary action | • Disciplinary Probation  
• Mandatory counseling and treatment  
• Service to the college community  
• College-Level disciplinary action |
| Distribution or intent to distribute a controlled substance in violation of HTC policy or federal, state, or local law | • Legal action  
• College-level disciplinary actions | • Legal action  
• College-level disciplinary action |

HTC uses the following definitions for the above sanctions:

- **Possession:** Illegal holding or controlling of alcohol, drugs, or associated paraphernalia.
- **Use:** Illegal personal use of alcohol or drugs.
- **Abuse:** Repeated illegal use of alcohol or drugs, or use accompanied by other behavior, including but not limited to:
  - Disorderly, disruptive, or aggressive behavior that interferes with the well-being, safety, security, health, or welfare of the community and/or the regular operations of HTC
  - Engaging in or threatening to engage in any behavior that endangers the health, safety, or well-being of oneself, another person, or property
• Physical violence (actual or threatened) against any individual or group of persons

• **Distribution**: Illegal sale, exchange, or giving of alcohol or other drugs to one or more persons. Factors to consider when determining HTC’s response include, but are not limited to:
  o Health and wellness of the responsible student
  o HTC’s interests
  o Impact on the HTC community
  o Type, quantity, and packaging of the substance
  o Number of persons to which the substance was distributed
  o Amount of revenue associated with the distribution
  o Existence of any other aggravating or extenuating circumstances

• **Warning**: A written reprimand putting the student on notice that he/she has violated the Personal Conduct Policy and indicating that further misconduct may result in a more severe disciplinary action. A copy of this warning is placed in the student's folder.

• **Probation**: A student may be placed on disciplinary probation for a definite period of time. While on probation, students may not represent HTC in any capacity. Further violations while on probationary status will result in suspension or expulsion from HTC.

• **Counseling and Treatment**: A student's continued enrollment at HTC may be conditioned on his/her participation in counseling or treatment at outside counseling and treatment agencies. A student's failure to participate in such a program after being advised that his/her enrollment is conditional upon it, may result in other disciplinary sanctions.

• **Legal Action**: The administration may recommend that students be turned over to law enforcement authorities for legal action. The final decision on referring student cases to the authorities is made by the Office of the CEO.

**College-Level Sanctions:**

• **Service to College Community**: Student must complete a designated number of hours of service to the HTC community. Service hours cannot interfere with the individual’s course schedule.

• **Disciplinary Probation**: Exclusion from participation in specified privileges or HTC programs and activities as set forth in the notice of disciplinary probation for a designated period of time.

• **Restitution**: A student may be required to pay restitution to HTC or to fellow students for damages and losses resulting from his/her actions.

• **Suspension**: At any time during a student’s enrollment at HTC he/she may be suspended and barred from attending classes for a definite period, not to exceed two years. Notification of the suspension will appear on the
student’s academic transcript and will remain until the end of the suspension period. A notification of the suspension will remain in the student’s file. A student may not be automatically enrolled at the end of his suspension. He/she must apply to the office of the Dean for re-enrollment.

- **Expulsion:** This is termination of the student’s enrolled status at the college. A student who is expelled from the college is not permitted to complete his courses and may not re-register for a future semester. Notification of the expulsion will appear on the student’s academic transcript.

For **faculty and staff members:**

Each faculty and staff member of HTC is expected to abide by HTC’s policies for maintaining a drug-free workplace. The policy statement on drug abuse pertaining to students also applies to faculty and staff. Furthermore, all faculty and staff are required to notify the appropriate Dean of any criminal conviction relating to his or her own drug activity within five (5) days of such conviction. Faculty and staff (part-time or full-time) who violate HTC policies on drugs and controlled substances may be subject to disciplinary sanctions, or other sanctions, as follows (sanctions need not be progressive):

- **Censure:** A written reprimand, outlining the violation(s) of HTC’s policies, may be placed in the personnel file of individual violators.
- **Probation:** Faculty and/or staff may be placed on probation for a definite period of time up to a maximum of one year. In such instances, individuals may be required to enroll in a therapeutic counseling or treatment program.
- **Suspension:** Faculty and/or staff may be suspended from employment without pay for a period of time ranging from seven days to a maximum of one year.
- **Termination of Employment:** Faculty and/or staff may be dismissed from employment upon written notice by Vice President for Administration, the Chief Academic Officer, or the Chief Executive Officer.
- **Legal Action:** Faculty and/or staff may be turned over to law enforcement authorities for criminal prosecution and legal action.

In both cases for students and faculty and staff, the existence of a tiered system of disciplinary sanctions measures does not preclude HTC from levying a heavy sanction, without first resorting to a lesser sanction. By way of illustration and not exclusion, HTC may expel a student or terminate a staff member for a violation of
policy without first issuing a warning or putting that student or employee on probation.

5.0 REGULATIONS ON ALCOHOL USE/ABUSE

The following regulations apply to students, faculty and staff of HTC:

- The consumption of alcoholic beverages by individuals under the age of 21 is illegal.
- All persons are prohibited from consuming alcoholic beverages on the premises of HTC (unless at an event specifically sanctioned by HTC Administration in writing), or entering or remaining on HTC premises in an impaired state.
- Alcoholic beverages may not be served to HTC students as part of College-sponsored events or non-official activities connected with the College - except for sacramental purposes, and then only under faculty supervision.
- Students who meet the legal criteria for purchase of alcoholic beverages in Illinois may request permission from the Residence Supervisor or Dean to bring sacramental wine into the residence hall for Sabbath and/or holidays. Permission is granted only when the Residence Supervisor or Dean is confident that the beverage is consistent with the dictates of Jewish law and will be used for ritual purposes only by individuals conforming to State of Illinois criteria for the possession of alcohol.
- Any student, who falsely represents himself/herself at a sanctioned HTC event as being of age to consume alcohol, may be subject to disciplinary action as outlined in the Personal Conduct Policy.
- Any faculty and/or staff member of HTC who provides alcohol to a minor on HTC premises shall be subject to full penalty under the laws of Illinois.
- Forcing any student or faculty member to consume alcohol and/or drugs for the purpose of initiation into or affiliation with any HTC sanctioned organization is not permitted.
- Alcoholism, while it may be a disability, does not excuse any faculty and/or staff member of HTC from violating a legitimate HTC policy or neglecting their responsibilities to HTC. Individuals whose work performance is impaired as a result of the use/abuse of alcohol may be required to participate in an appropriate evaluation/treatment program and may, in certain circumstances, lead to sanctions against that individual. If you are an alcoholic, you may self-identify to the Dean of your campus or supervisor, as the case may be, and request confidential counseling and/or referral services to help with your problems. All inquiries and requests for assistance will be handled with strict
• HTC observes the culpability laws for serving drinks to the mentally-impaired and to individuals who are already inebriated. Some signs that may indicate if a person is inebriated may be the smell of alcohol on their clothes, impairment to speech, mood changes, slowed reflexes, or impairment of coordination.

• NOTE: Mothers who drink alcohol during pregnancy may give birth to infants with irreversible physical abnormalities and cognitive disabilities. Research shows that children of alcoholic parents are at greater risk.

6.0 CRIMINAL SANCTIONS FOR ALCOHOL MISUSE

Persons giving or selling alcohol to someone under 21 years of age are committing a misdemeanor or possible felony crime punishable in Illinois State by a maximum $2,500 fine and up to a year in jail for a misdemeanor offense and a prison sentence of a year or more and fines up to $25,000.

If you are under the age of 21, you are prohibited from possessing alcoholic beverages with the intent to consume them. Each violation is punishable by a minimum $500 fine and/or completion 25 hours of community service, preferably as part of an alcohol abuse prevention program. You can be convicted of a Class A misdemeanor punishable by up to one year in jail and fines up to $2,500 for being under 21 and presenting falsified proof in the form of a valid license or state ID of another individual when purchasing or attempting to purchase alcoholic beverages. You can also be convicted of a Class 4 felony punishable by up to three years imprisonment and fines up to $25,000 for being under 21 and presenting falsified proof in the form of a fraudulent license or state ID which has been produced by someone other than a government office when purchasing or attempting to purchase alcoholic beverages.

7.0 SUBSTANCE ABUSE SELF-IDENTIFICATION AND AMNESTY

HTC recognizes that, sometimes, there may be health or safety emergencies related to the use of drugs or alcohol in which the potential for disciplinary action by HTC may deter students who want to seek assistance for themselves or for another member of the HTC community. In such instances, the health and safety of the at-risk student will be HTC’s top priority. Therefore, should a student, or another individual on behalf of that student, voluntarily come forward seeking assistance in a situation involving the over-consumption or abuse of drugs and/or alcohol, HTC’s student conduct response to the over-consumption/abuse will be, first and foremost, focused on medical treatment, counseling, and/or educational interventions. However, HTC reserves the right to address any associated acts that compromises the well-being of its community and its members, such as
harassment, violence, damage, harm to self or others, or distribution of illegal substances, on a case-by-case basis as deemed appropriate and necessary.

**Reporting a Personal Concern:** Students who have concerns about their use of alcohol and/or other drugs, or students who are concerned of such use by a friend, are encouraged to seek assistance through one of HTC’s support services. Confidentiality in these circumstances may be protected in compliance with HTC policy and applicable law (e.g. FERPA, HIPPA, etc.).

### 8.0 Substance Abuse Counseling

Many different mutual and self-help programs are available near HTC campuses. Although most programs are abstinence-based and follow the 12-step approach, there are also programs that support moderation and a goal and/or do not use 12 steps. Some of the programs listed below may have a religious affiliation, others may merely use spirituality as part of the program. Meeting times and locations are available upon contacting the corresponding phone numbers or websites. Each meeting is somewhat different from any other, even within the same program, both in terms of structure and participants. Many people find it helpful to explore different options.

**United States**

- **National Drug & Alcohol Treatment Referral Service:**
  - Phone: 800-662-4357

- **Alcoholics Anonymous:**
  - Phone: 312-346-1475
  - Website: www.chicagoaa.org

- **Focus on Recovery:**
  - Phone: 800-234-0420

- **Marijuana Anonymous:**
  - Phone: 800-766-6779
  - Website: www.marijuana-anonymous.org

- **Cocaine Anonymous:**
  - Phone: 310-559-5833
  - Website: www.ca.org

- **Narcotics Anonymous:**
  - Phone: 708-848-4884
  - Website: www.chicagona.org
• Al-Anon:
  - Phone: 773-471-0225
  - Website: www.niafg.com

• Illinois Department of Human Services
  - Phone: 800-843-6154
  - Website: http://www.dhs.state.il.us/page.aspx?item=29725

Israel
• Narcotics Anonymous:
  - Phone: 972-50-5947837
  - Website: http://www.naisrael.org.il/

• Retorno International Recovery Group:
  - Phone: 718-210-9755
    - 972-52-436-9888
  - Email: Soshana@retorno.org
  - Website: www.retnorno.org

• Malkishua Drug Rehabilitation Center:
  - Phone: 972-46488222
  - Email: malikishua@malikishua.org.il
  - Website: http://www.malkishua.org.il
    - http://www.malkishua.org.il/eng/ (English version)

9.0 IMPLEMENTATION

This policy shall be implemented by the Vice President for Administration and the Chief Academic Officer.

10.0 APPROVAL

This policy has been approved by the Chief Executive Officer.
HEBREW THEOLOGICAL COLLEGE POLICY CONCERNING
SEX DISCRIMINATION, SEXUAL HARASSMENT AND SEXUAL ASSAULT

1.0 POLICY

Hebrew Theological College ("HTC") pledges its efforts to ensure an environment in which the dignity and worth of all members of the community are respected. It is the policy of HTC that sexual intimidation of students and employees is unacceptable behavior and will not be tolerated. HTC will not tolerate unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature constituting sexual harassment or sexual assault (i.e. rape, fondling, incest or statutory rape).

In general, it is a sex crime to engage in any sexual contact with a person who does not affirmatively consent, or to engage in sexual intercourse, deviant sexual intercourse, or sexual abuse if it is accomplished by forcible compulsion. Illinois state law also defines these acts as crimes if any of them are engaged in with a person who is incapable of consent either because of the person's age or because the person is mentally incapacitated, or physically helpless. Therefore, sexual abuse, sexual assault, and rape are sex crimes and violators will be prosecuted in accordance with Illinois state law.

2.0 PURPOSE

All divisions of HTC seek to foster a collegial atmosphere where students are nurtured and educated through close faculty-student relationships, student camaraderie, and individualized attention. Discrimination or harassment of any kind, including sexual assault (i.e. rape, fondling, incest or statutory rape), domestic violence, dating violence, and stalking, is anathema to HTC’s mission, history, and identity. HTC will resolve any identified discrimination, harassment or sexual assault in a timely and effective manner. Compliance with HTC’s policies and procedures is a necessary step in achieving a safe environment in our educational community. The policies set forth were developed to promote a safe educational environment in compliance with the Violence Against Women Act (VAWA), Illinois Law including the Illinois Preventing Sexual Violence in Higher Education Act, and a high quality campus life.

3.0 SCOPE

This policy applies to all members of HTC, including students, faculty, and
administrators as well as third-parties (including, but not limited to, vendors, invitees, etc.). This policy applies to events that occur on-campus, off-campus, and on study abroad. Information and/or training regarding this policy are available to students, faculty, and staff. In addition, information about this policy will be available on HTC’s website.

4.0 Definitions

- **Advisor**
  - Any individual who provides the accuser or accused support, guidance, or advice.

- **Awareness Programs**
  - Awareness program means community-wide or audience-specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration.

- **Ongoing Prevention and Awareness Campaigns**
  - Ongoing prevention and awareness campaigns means programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audience throughout the institution and including information on definitions of different crimes, options for bystander intervention, and risk reduction.

- **Primary Prevention Programs**
  - Primary prevention programs means programming, initiatives, and strategies informed by research or assessed for value, effectiveness, or outcome that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe directions.

- **Risk Reduction**
  - Risk reduction means options designed to decrease perpetration and bystander inaction and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

- **Consent (with regards to sexual activity)**
  - Affirmative consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity.
  - Communicated through mutually understandable words or actions that clearly indicate willingness by all the involved parties to engage in the same sexual activity, at the same time, and in the same way.
  - Silence and lack of resistance do not constitute consent.
- **Dating Violence**
  - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and
  - The existence of a social relationship is based on the “reporting party’s statement” with consideration of
    - the length of the relationship,
    - the type of relationship, and
    - the frequency of the interaction between the persons involved.
  - Dating violence does not include acts covered by the definition of domestic violence.

- **Domestic Violence**
  - Domestic violence is a felony or misdemeanor crime of violence committed by any of the following individuals:
    - A current or former spouse or intimate partner of the victim; or
    - A person with whom the victim shares a child in common; or
    - A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner; or
    - A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under VAWA]; or
    - Any other person against an adult or youth victim who is protected under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

- **Proceeding**
  - All activities related to a non-criminal resolution of an institutional disciplinary complaint, including, but not limited to, factfinding investigations, formal or informal meetings, and hearings.
  - Does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim.

- **Result**
  - Any initial, interim, and final decision by any official or entity authorized to resolve disciplinary matters within the institution.
  - The result must include any sanctions imposed by the institution and the rationale for the result and the sanctions.

- **Discrimination and Harassment**
  - Title IX, and its implementing regulations, prohibit discrimination based on sex, including sexual harassment. The prohibition against discrimination extends to employment and third-parties. Sexual harassment is unwelcome conduct of a sexual nature and can include sexual advances, request for sexual favors, and other verbal, non-verbal, or physical conduct. Environmental harassment (sometimes referred to as hostile environment) is sexually harassing conduct that is sufficiently severe, persistent or pervasive to limit an individual’s ability to participate in or receive benefits, services, or opportunities at HTC. This can include persistent comments or jokes about an
individual’s, sex; verbal behavior, including insults, remarks, epithets, or derogatory statements; nonverbal behavior, including graffiti, inappropriate physical advances short of physical violence such as repeated and unwanted touching; and assault, including physical violence or the threat of physical violence.

- **Sexual Harassment**
  - Unwelcome sexual advances, requests for sexual favors, and, other visual, verbal or physical conduct of a sexual nature, when:
    - An individual’s submission to or rejection of the conduct is made, either explicitly or implicitly, a term or condition of employment or of status in a course, program, or activity, or is used as a basis for employment or academic decision; or
    - The conduct has the purpose or effect of unreasonably interfering with an individual’s work performance, academic performance, or educational experience, or of creating an intimidating, hostile, humiliating, or offensive working, educational, or living environment.

- **Sexual Offense**
  - Unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature constituting sexual harassment.

- **Sexual Assault**
  - Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent, and including rape, fondling, incest or statutory rape as acted in the FBI’s Uniform Crime Reporting program.
    - **Rape**
      - Is the perpetuation of an act of sexual intercourse with a person against his or her will and consent, or when such person is incapable of giving consent because of his or her youth or his or her temporary or permanent mental or physical incapacity.
      - Is the penetration of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person without the consent of a person, or when such person is incapable of giving consent.
  - Acquaintance rape is rape that involves people who know or are familiar with each other.

- **Stalking**
  - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person’s safety or the safety of others or suffer substantial emotional distress.
  - A course of conduct is two or more acts, including, but limited to:
    - Acts in which the ‘stalker’ directly, indirectly, or through third parties by any action, method, device, or means,
    - Follows, monitors, observes, surveils, threatens, or communication to or about, a person or interferes with a person’s property.
  - Substantial emotional distress is a significant mental suffering or anguish that may, but does not necessarily require, medical or other
professional treatment or counseling.

- A reasonable person is one under similar circumstances and with similar identities to the victim.

**Jurisdictional Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking**

### Domestic Violence

- Under Illinois Domestic Violence Act, any individual who threatens, harasses, hits, chokes, kicks, or, in any other way, interferes with the personal liberty interests of another family or household member has violated such law. Illinois defines “family or household members” as any: (a) family members related by blood, or persons who (b) were previously married or are currently married, (c) previously shared or currently share a dwelling, (d) have or claim to have a child together, (e) share a child in common, (f) previously were or currently are dating, or (g) are disabled and their caregivers.

- Please see the meaning of the pertinent definitional terms under section 103 of the Act below:
  - “Domestic violence” – means abuse as defined under the Act.
  - “Abuse” – means 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.
  - “Physical abuse” includes sexual abuse and means any of the following:
    - knowing or reckless use of physical force, confinement or restraint;
    - knowing, repeated and unnecessary sleep deprivation; or
    - knowing or reckless conduct which creates an immediate risk of physical harm.
  - “Harassment” – means knowing conduct which is not necessary to accomplish a purpose that is reasonable under the circumstances; would cause a reasonable person emotional distress; and does cause emotional distress to the petitioner. Unless the presumption is rebutted by a preponderance of the evidence, the following types of conduct shall be presumed to cause emotional distress:
    - creating a disturbance at petitioner's place of employment or school;
    - repeatedly telephoning petitioner's place of employment, home or residence;
    - repeatedly following petitioner about in a public place or places;
- repeatedly keeping petitioner under surveillance by remaining present outside his or her home, school, place of employment, vehicle or other place occupied by petitioner or by peering in petitioner's windows;
- improperly concealing a minor child from petitioner, repeatedly threatening to improperly remove a minor child of petitioner's from the jurisdiction or from the physical care of petitioner, repeatedly threatening to conceal a minor child from petitioner, or making a single such threat following an actual or attempted improper removal or concealment, unless respondent was fleeing an incident or pattern of domestic violence; or
- threatening physical force, confinement or restraint on one or more occasions

- “Intimidation of a dependent” – means subjecting a person who is dependent because of age, health or disability to participation in or the witnessing of: physical force against another or physical confinement or restraint of another which constitutes physical abuses as defined in this Act, regardless of whether the abused person is a family or household member.
- “Interference with personal liberty” – means committing or threatening physical abuse, harassment, intimidation or willful deprivation so as to compel another to engage in conduct from which she or he has a right to abstain or to refrain from conduct in which she or he has a right to engage.

- **Dating Violence**
  - Illinois’ Domestic Violence Act encompasses dating violence. A “dating relationship,” for purposes of the Act are included within the meaning of “family or household members,” and refers to a serious courtship.
  - Pursuant to Illinois’ Campus Security Enhancement Act, education institutions of higher learning located within the state are required to either participate in a regional task force or establish their own task force, the primary purpose of which is to prevent domestic violence, dating violence, sexual assault and stalking on campus. Under this Act, “sexual violence” is defined as physical sexual acts attempted or perpetrated against a person’s will or when a person is incapable of giving consent, including, without limitation, rape, sexual assault, sexual battery, sexual abuse and sexual coercion.

- **Sexual Assault**
  - Under Article 11 of Illinois’ Criminal Code, “criminal sexual assault” is a criminal offense that is defined as:
    - a person commits criminal sexual assault if that person commits an act of sexual penetration and either:
      - uses force or threat of force;
      - knows that the victim is unable to understand the nature of the act or is unable to give knowing consent;
• is a family member of the victim, and the victim is under 18 years of age; or (4) is 17 years of age or over and holds a position of trust, authority, or supervision in relation to the victim, and the victim is at least 13 years of age but under 18 years of age.

- Under the Criminal Code, “aggravated criminal sexual assault” is a criminal offense, defined as:
  - A person commits aggravated criminal sexual assault if that person commits criminal sexual assault and any of the following aggravating circumstances exist during the commission of the offense or, for purposes of paragraph (7), occur as part of the same course of conduct as the commission of the offense:
    - the person displays, threatens to use, or uses a dangerous weapon, other than a firearm, or any other object fashioned or used in a manner that leads the victim, under the circumstances, reasonably to believe that the object is a dangerous weapon;
    - the person causes bodily harm to the victim, except as provided in paragraph 10;
    - the person acts in a manner that threatens or endangers the life of the victim or any other person;
    - the person commits the criminal sexual assault during the course of committing or attempting to commit any other felony;
    - the victim is 60 years of age or older;
    - the victim is a person with a physical disability;
    - the person delivers (by injection, inhalation, ingestion, transfer of possession, or any other means) any controlled substance to the victim without the victim's consent or by threat or deception for other than medical purposes;
    - the person is armed with a firearm;
    - the person personally discharges a firearm during the commission of the offense; or
    - the person personally discharges a firearm during the commission of the offense, and that discharge proximately causes great bodily harm, permanent disability, permanent disfigurement, or death to another person.
  - A person commits aggravated criminal sexual assault if that person is under 17 years of age and:
    - commits an act of sexual penetration with a victim who is under 9 years of age; or
    - commits an act of sexual penetration with a victim who is at least 9 years of age but under 13 years of age and the person uses force or threat of force to commit the act.
  - A person commits aggravated criminal sexual assault if that person commits an act of sexual penetration with a victim who is a person with a severe or profound intellectual disability.

- Under the Criminal Code, “criminal sexual abuse” is a criminal offense, defined as:
• A person commits criminal sexual abuse if that person:
  • commits an act of sexual conduct by the use of force or threat of force; or
  • commits an act of sexual conduct and knows that the victim is unable to understand the nature of the act or is unable to give knowing consent.
• A person commits criminal sexual abuse if that person is under 17 years of age and commits an act of sexual penetration or sexual conduct with a victim who is at least 9 years of age but under 17 years of age.
• A person commits criminal sexual abuse if that person commits an act of sexual penetration or sexual conduct with a victim who is at least 13 years of age but under 17 years of age and the person is less than 5 years older than the victim.
  o Under the Criminal Code, “aggravated criminal sexual abuse” is a criminal offense, defined as:
    • A person commits aggravated criminal sexual abuse if that person commits criminal sexual abuse and any of the following aggravating circumstances exist (i) during the commission of the offense or (ii) for purposes of paragraph (7), as part of the same course of conduct as the commission of the offense:
      • the person displays, threatens to use, or uses a dangerous weapon or any other object fashioned or used in a manner that leads the victim, under the circumstances, reasonably to believe that the object is a dangerous weapon;
      • the person causes bodily harm to the victim;
      • the victim is 60 years of age or older;
      • the victim is a person with a physical disability;
      • the person acts in a manner that threatens or endangers the life of the victim or any other person;
      • the person commits the criminal sexual abuse during the course of committing or attempting to commit any other felony; or
      • the person delivers (by injection, inhalation, ingestion, transfer of possession, or any other means) any controlled substance to the victim for other than medical purposes without the victim's consent or by threat or deception.
• A person commits aggravated criminal sexual abuse if that person commits an act of sexual conduct with a victim who is under 18 years of age and the person is a family member.
• A person commits aggravated criminal sexual abuse if:
  • that person is 17 years of age or over and:
    o commits an act of sexual conduct with a victim who is under 13 years of age; or
    o commits an act of sexual conduct with a victim who is at least 13 years of age but under 17 years of age and the person uses force or threat of force to commit the act; or
that person is under 17 years of age and:
  o commits an act of sexual conduct with a victim who is under 9 years of age; or
  o commits an act of sexual conduct with a victim who is at least 9 years of age but under 17 years of age and the person uses force or threat of force to commit the act.

A person commits aggravated criminal sexual abuse if that person commits an act of sexual penetration or sexual conduct with a victim who is at least 13 years of age but under 17 years of age and the person is at least 5 years older than the victim.

A person commits aggravated criminal sexual abuse if that person commits an act of sexual conduct with a victim who is a person with a severe or profound intellectual disability.

A person commits aggravated criminal sexual abuse if that person commits an act of sexual conduct with a victim who is at least 13 years of age but under 18 years of age and the person is 17 years of age or over and holds a position of trust, authority, or supervision in relation to the victim.

For purposes of Article 11, “sexual conduct” means any knowing touching or fondling by the victim or the accused, either directly or through clothing, of the sex organs, anus, or breast of the victim or the accused, or any part of the body of a child under 13 years of age, or any transfer or transmission of semen by the accused upon any part of the clothed or unclothed body of the victim, for the purpose of sexual gratification or arousal of the victim or the accused. In the context of Article 11, “sexual penetration” means any contact, however slight, between the sex organ or anus of one person and an object or the sex organ, mouth, or anus of another person, or any intrusion, however slight, of any part of the body of one person or of any animal or object into the sex organ or anus of another person, including, but not limited to, cunnilingus, fellatio, or anal penetration. Evidence of emission of semen is not required to prove sexual penetration.

**Stalking**

Under Article 12 of Illinois’ Criminal Code, “aggravated stalking” is a criminal offense in which:

- A person commits stalking and:
  - causes bodily harm to the victim;
  - confines or restrains the victim; or
  - violates a temporary restraining order, an order of protection, a stalking no contact order, a civil no contact order, or an injunction prohibiting the behavior described in subsection (b)(1) of Section 214 of the Illinois Domestic Violence Act of 1986.

(a-1) A person commits aggravated stalking when he or she is required to register under the Sex Offender Registration Act or has been previously required to register under that Act and commits the offense of stalking when the victim of the stalking is also the victim of the offense for which
the sex offender is required to register under the Sex Offender Registration Act or a family member of the victim.

- Definitions under the Illinois Preventing Sexual Violence in Higher Education Act (110 ILCS 155)
  - "Awareness programming" means institutional action designed to communicate the prevalence of sexual violence, including without limitation training, poster and flyer campaigns, electronic communications, films, guest speakers, symposia, conferences, seminars, or panel discussions.
  - "Bystander intervention" includes without limitation the act of challenging the social norms that support, condone, or permit sexual violence.
  - "Complainant" means a student who files a complaint alleging violation of the comprehensive policy through the higher education institution's complaint resolution procedure.
  - "Comprehensive policy" means a policy created and implemented by a higher education institution to address student allegations of sexual violence, domestic violence, dating violence, and stalking.
  - "Confidential advisor" means a person who is employed or contracted by a higher education institution to provide emergency and ongoing support to student survivors of sexual violence with the training, duties, and responsibilities described in Section 20 of this Act.
  - "Consent"
    - (i) consent is a freely given agreement to sexual activity,
    - (ii) a person's lack of verbal or physical resistance or submission resulting from the use or threat of 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,
    - (vi) 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 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.
  - "Higher education institution" means a public university, a public community college, or an independent, not-for-profit or for-profit
higher education institution located in this State.

- "Primary prevention programming" means institutional action and strategies intended to prevent sexual violence before it occurs by means of changing social norms and other approaches, including without limitation training, poster and flyer campaigns, electronic communications, films, guest speakers, symposia, conferences, seminars, or panel discussions.

- "Respondent" means a student involved in the complaint resolution procedure who has been accused of violating a higher education institution's comprehensive policy.

- "Sexual violence" means physical sexual acts attempted or perpetrated against a person's will or when a person is incapable of giving consent, including without limitation rape, sexual assault, sexual battery, sexual abuse, and sexual coercion.

- "Survivor" means a student who has experienced sexual violence, domestic violence, dating violence, or stalking while enrolled at a higher education institution.

- "Survivor-centered" means a systematic focus on the needs and concerns of a survivor of sexual violence, domestic violence, dating violence, or stalking that (i) ensures the compassionate and sensitive delivery of services in a nonjudgmental manner; (ii) ensures an understanding of how trauma affects survivor behavior; (iii) maintains survivor safety, privacy, and, if possible, confidentiality; and (iv) recognizes that a survivor is not responsible for the sexual violence, domestic violence, dating violence, or stalking.

- "Trauma-informed response" means a response involving an understanding of the complexities of sexual violence, domestic violence, dating violence, or stalking through training centered on the neurobiological impact of trauma, the influence of societal myths and stereotypes surrounding sexual violence, domestic violence, dating violence, or stalking, and understanding the behavior of perpetrators.

- **Preponderance of the Evidence**
  - Just enough evidence to make it more likely than not that the fact the claimant seeks to prove is true.

- **Retaliation**
  - Retaliation is any kind of reprisal, adverse action, or negative action taken against an individual because he or she has:
    - complained about alleged discrimination or harassment as defined above,
    - participated as a party or witness in an investigation relating to such allegations, or
    - participated as a party or witness in a proceeding regarding such allegations. Retaliation can occur contemporaneously during the complaint process or subsequent to it, once the retaliator is aware of the recipient’s participation in the process.
  - Retaliation does not exist in the absence of an adverse action. An
individual is protected from retaliation even when the complaint at issue is ultimately found to lack merit, as long as the complaint was made in good faith.

- HTC does not allow, nor tolerate any conduct by any HTC community member that may be regarded as retaliatory. Retaliation against any individual, whether said person submitted a complaint through the method described below, or for any other reason will not be tolerated.

- **Title IX Coordinator:** the Title IX Coordinator or his designee (“Title IX Coordinator”) is annually trained and knowledgeable about enforcement, compliance, communication, and implementation of HTC’s anti-harassment policy. The Title IX Coordinator’s contact information is as follows:

  Cheryl Karp  
  Title IX Coordinator  
  7135 N. Carpenter Road  
  Skokie, Illinois 60077  
  Phone: 847-982-2500  
  Email: karp@htc.edu

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5.0 **PROCEDURES**

**Duty to Report Violations**

All members of the HTC community are required to cooperate fully with any investigations of discrimination or harassment. A faculty member, staff member, or student who has relevant information and refuses to cooperate with an ongoing investigation will be subject to disciplinary action for, among other things, violations of the HTC policy and/or insubordination.

Likewise, all HTC employees are required to ensure that complaints about discrimination, harassment, or retaliation are directed to the appropriate administrative office for evaluation and investigation. HTC is committed to conducting an inquiry that is thorough, prompt and impartial.

**Formal Investigation and Resolution of Discrimination, Harassment, Sexual Assault or Retaliation Complaints**

**Duty to Cooperate and Facilitate**

All members of HTC are required to cooperate fully with any investigations of harassment. A faculty member, staff member, or student who has relevant information and refuses to cooperate with an ongoing investigation will be subject to disciplinary action for, among other things, violations of the HTC Code of Conduct and/or insubordination. Likewise, all HTC employees are required to ensure that complaints about harassment are directed to the appropriate administrative office for evaluation and investigation.
Right to Prompt and Impartial Proceeding and Complaint Process

HTC is committed to conducting an inquiry that is thorough, prompt and impartial. Accused and accuser will have the opportunity to object to HTC participants as impartial.

Victims have the options to notify proper law enforcement authorities, including on-campus and local police, or to decline to notify such authorities. Complaints concerning sexual harassment and/or sexual discrimination should be sent to Cheryl Karp Title IX Coordinator 7135 N. Carpenter Road Skokie, Illinois 60077 (847) 982-2500 karp@htc.edu. Complaints should be filed as soon as possible after the date of the alleged misconduct, and a written complaint is preferable. The HTC Title IX Coordinator will respond within twelve (12) hours to a report received electronically. Complaints can be made confidentially and anonymously by calling (646) 565.6330.

A complaint, which must be submitted within the later of the following two dates: (a) thirty (30) days after the alleged misconduct; or, (b) the end of the semester in which the alleged incident occurred. A complaint should include the following information:

- Complainant’s full name, home address, email, telephone number, and HTC Student/Employee ID number.
- Name of the person against whom the complaint was made, including job title or student status, if known.
- The protected status that is the basis for the alleged discrimination, harassment, or retaliation based on the complainant’s gender.
- A clear statement of the facts that constitute the alleged discrimination, harassment, or retaliation, including dates on which the acts were committed and any information to identify witnesses.
- Complainant should include the term and year of his/her most recent active employment, academic, or student status within the university.
- A student who is seeking admission to HTC should include the term and year in which he/she sought admission to the university.
- The full name, address, and telephone number of complainant’s advisor or supervisor, if any.
- The specific harm that resulted from the alleged act and the remedy sought.
- The complainant’s signature and the date on which the complaint was submitted.

The accused will receive notice of the complaint, along with references to the specific code provision violated, and notification of possible sanctions. While
prompt reporting is expected, complaints older than 30 days will be processed. However, if more than 365 days have elapsed since the day of the complaint, the complaint may not be processed. Every effort is made to conduct a thorough and speedy investigation. Several factors may impact HTC’s ability to conduct a prompt investigation, including, but not limited to: the Complainant’s accessibility or unresponsiveness, witness availability or unresponsiveness, the number of witnesses, the timing of the investigation (i.e. if an investigation is being conducted at a time when students are taking final exams or on recess), etc. The process allows for extension with good cause shown.

**Accommodations and Protective Measures Available for Victims**

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

At the victim’s request, and to the extent of the victim’s cooperation and consent, HTC’s offices will work cooperatively to assist the victim in obtaining accommodations. If reasonably available, a victim may be offered changes to academic, living, working or transportation situations regardless of whether the victim chooses to report the crime to campus police or local law enforcement. Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall. Possible changes to work situations may include changing working hours. Possible changes in transportation may include having the student or employee park in a different location, assisting the student or employee with a safety escort, etc.

Certain remedial measures may be taken to protect both parties during the pendency of the investigation, including changes to academic, living, transportation, and working situations or other protective measures. HTC may make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

To request changes to academic, living, transportation and/or working situations or protective measures, a victim should contact the Title IX Coordinator Cheryl
Karp at 847-982-2500. If the victim wishes to receive assistance in requesting these accommodations, she or he should contact the Title IX Coordinator Cheryl Karp at 847-982-2500.

Notice and Timely Access and Preservation of Evidence
The proceeding will be consistent with HTC’s policies and transparent to both the accuser and the accused. Both accuser and accused will receive timely notice of meetings at which either accuser, accused, or others (upon request) may be present. Both accuser and accused will receive timely and equal access to information that will be used during formal and informal disciplinary meetings or hearings. HTC will endeavor to protect the privacy of the participating parties and/or witnesses.

It is very important that the victim preserve any proof or evidence of any criminal offense. Such incidents will be reviewed and investigated in an expedient and professional manner.

Intake Interview
After receipt of a complaint, the Title IX Coordinator or his/her designee will meet with the complainant as soon as possible, usually within one week, but not later than thirty (30) days after receipt. The complainant must make himself/herself available to meet. The meeting will be an intake interview where the Title IX Coordinator or his/her designee will inform the complainant about the investigation procedure and timeline. The complainant will have an opportunity to provide or present evidence and witnesses on their behalf. The complainant may sign a formal complaint form at that time (under the above guidelines) if he/she has not already done so. A complaint will proceed even in the absence of a signed written complaint.

Complaints about Students, Faculty, Other Employees or Third Parties
HTC’s disciplinary process includes a prompt, fair, and impartial investigation and resolution process from the initial investigation to the final result. Upon receipt of a complaint, the Title IX Coordinator or his/her designee shall investigate the circumstances of the complaint. This investigation will include documented interviews of the complainant, the person against whom the complaint is written, and witnesses with relevant knowledge, if any. Further, the investigation will include a review of relevant documents and any other evidence. HTC will use the preponderance of the evidence standard in the investigation and disciplinary action, as VAWA requires.

Investigation of Complaints
The Title IX Coordinator or his/her designee shall have thirty (30) days from the intake interview to complete the investigation of the event in question. Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within 60 days of the report. However, each proceeding allows for extensions of timeframes for good cause with written notice to the accuser and the accused of the delay and the reason for the delay. HTC officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking as well as how to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. Such thirty (30) days may be extended in the event that one of the following occurs:

- Availability or unavailability of a witness or relevant/material documents;
- Reluctance of a witness and/or any necessary party;
- Delay or other uncooperative actions of any necessary party;
- Numerosity of witnesses;
- Holidays and vacation periods;
- Any other unforeseeable events/circumstances.

Both the complainant and respondent will have the same opportunities to have others present during any disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. HTC will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding, but HTC may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties.

If a hearing is required, neither the complainant nor respondent shall be compelled to participate in the proceedings in the presence of the other party. If this right is invoked, HTC shall provide a procedure by which, at a minimum, each party can hear the other party’s testimony.

Generally speaking an investigation will take less than 60 calendar days following receipt of the complaint. This may not be practicable in every investigation and may vary depending on the complexity of the investigation and the severity and extent of the harassment. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the accuser or the accused.

Notice of Determination and Further Action
The Title IX Coordinator or his/her designee shall report the findings of the investigation to a designated, impartial Fact Finder. The Fact Finder shall endeavor to issue a determination within fifteen days after receipt of the investigation file to determine and detail: (a) whether there is probable cause to believe discrimination occurred with respect to each allegation in the complaint, (b) a description of actions taken, if any, to prevent similar problems from occurring in the future, and (c) the proposed resolution of the complaint. Both parties will be informed of the outcome reached and sanctions imposed as a result of such investigation and determination.

Both the complainant, the party who filed the complaint or the alleged target of the sexual harassment or sexual assault, and the respondent, the accused, shall be informed of the fact finder’s decision, including the outcome reached and sanctions imposed, in writing simultaneously within seven days of the conclusion of the fact finder’s deliberation. They will both be notified simultaneously and in writing of the outcome of the proceeding; appeal procedures; any change to the result before it becomes final (if applicable); and when the result becomes final. Questions concerning these actions should be addressed to the Title IX Coordinator, Cheryl Karp. Notification to the appropriate law enforcement officials and other assistance to the student or staff member in notifying law enforcement officials will be provided, if requested.

HTC will provide the victim a written explanation of her/his rights and options with respect to the report when the victim reports to HTC about the misconduct.

Notification to Victims of Crimes of Violence
HTC will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as the result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Appeals
The complainant and respondent alike will be provided with at least one level of appeals.

Both the complainant and the respondent are eligible to file an appeal to the determination based on (i) a procedural error occurred, (ii) new information exists that would substantially change the outcome of the finding, or (iii) the sanction is disproportionate with the violation.
The request for an appeal, including the grounds upon which the request is based, should be submitted in writing to the Title IX Coordinator within seven (7) business days following the date on the outcome letter. The Appeal should state the remedy sought by the appealing party. Each party may respond in writing to any appeal submitted by the other party. Written responses to the other party’s appeal must be submitted within three (3) business days following delivery of the notice of the written appeal. Written requests for appeal submitted by one party will be shared with the other party.

Appeals will be conducted in an impartial manner by trained HTC officials without conflict of interest or bias for or against either party. A party with a concern about a conflict of interest or bias should contact the Title IX Coordinator. The Appeals Panel can determine whether a change in the decision is warranted. If applicable, both the accuser and accused will have an opportunity to be present or have others present during any disciplinary proceedings. If a change in this decision is necessary, the Appeals Panel will review the appeal and rationale and make a final decision. Both parties will be informed of the outcome reached and sanctions imposed as a result of such proceedings.

Appeals will not be reviewed or considered beyond the Appeals Panel. Appeals decisions will be rendered within twenty (20) business days after the receipt of the formal request for appeal. The appeal decision will be provided in writing to both parties and the appeal decision is final.

HTC has a grade appeal process, which is not circumvented by this policy. This procedure is not a substitute for a grade appeal. A grade appeal may be suspended until a determination has been made by the fact finder.

HTC will provide the victim a written explanation of her/his rights and options with respect to the report when the victim reports to HTC about the misconduct.

6.0 Sanctions for Violations

Student violators may be subject to the following sanctions and remedial measures on a case-by-case basis:

- **Warning**: A written reprimand putting the student on notice that he/she has violated the Code of Conduct. A copy of this warning is placed in the student's folder.
- **No-Contact Order**: A student may be ordered to temporarily not intentionally contact a victim through any medium.
- **Probation**: A student may be placed on disciplinary probation for a definite period of time. While on probation, students may not hold office
in Student Government Organizations, Clubs or Societies or represent the college in any capacity. Further violations while on probationary status will result in suspension or expulsion from the college.

- **Restitution**: A student may be required to pay restitution to the college or to fellow students for damages and losses resulting from his/her actions.
- **Suspension**: At any time during a student's enrollment at the college he/she may be suspended and barred from attending classes for a definite period, not to exceed two years. A student who is suspended is entitled to a written clarification with specific reasons for and description of the sanction. A student may not be automatically re-enrolled at the end of his/her suspension. He/she must apply to the Student Affairs Committee for re-enrollment.
- **Expulsion**: HTC may terminate a student's status at the college at any time.

Faculty and staff (part-time and full-time) who violate the policy will be subject to disciplinary sanctions on a case-by-case basis as follows:

- **Censure**: A written reprimand, outlining the violation(s) of college policies, may be placed in the personnel file of individual violators.
- **Probation**: Faculty and/or staff may be placed on probation for a definite period of time up to a maximum of one year. In such instances, individuals may be required to enroll in a therapeutic counseling or treatment program.
- **Suspension**: Faculty and/or staff may be suspended from employment without pay for a period of time ranging from seven days to a maximum of one year.
- **Termination of Employment**: Faculty and/or staff may be dismissed from employment upon written notice by the Dean of Faculties (for faculty members) or the Vice President for Administration (all other employees).
- **Legal Action**: Faculty and/or staff may be turned over to law enforcement authorities for criminal prosecution and legal action.

In both cases for students, faculty and staff, the existence of a progressive system of disciplinary sanctions measures does not preclude HTC from levying a heavy sanction, without first resorting to a lesser sanction. By way of illustration and not exclusion, HTC may expel a student or terminate a staff member for a violation of policy without first issuing a warning or putting that student or employee on probation.

**College-Initiated Protective Measures**
In addition to those protective measures previously described, the Title IX Coordinator or their designee will determine whether interim interventions and
protective measure should be implemented, and, if so, take steps to implement those protective measures as soon as possible. Examples of interim protective measures include, but are not limited to: an order of no contact, residence hall relocation, adjustment of course schedules, a leave of absence, or reassignment to a different supervisor or position. These remedies may be applied to one, both, or multiple parties involved. Violations of the Title IX Coordinator’s directives and/or protective measures will constitute related violations that may lead to additional disciplinary action. Protective measures imposed may be temporary pending the results of an investigation or may become permanent as determined by HTC.

7.0 CONFIDENTIALITY

HTC has independent obligations to report or investigate potential misconduct, even if a complainant does not wish to initiate an official process. Therefore, absolute confidentiality cannot be promised with respect to a complaint of discrimination, harassment, sexual harassment, sexual assault (i.e. rape, fondling, incest or statutory rape) or retaliation received either through HTC’s compliance hotline or otherwise. The phone number for the HTC hotline is 646-565-6000 x55330.

HTC wishes, however, to create an environment in which legitimate complaints are encouraged, while also protecting the privacy of all involved in an investigation. Complaints about violations of these policies will therefore be handled in strict confidence, with facts made available only to those who need to know in order for HTC to promptly and thoroughly investigate and resolve the matter. HTC employees will explain to the reporting individual whether he or she is authorized to offer the reporting individual privacy.

Reporting individuals may request confidentiality and choose not to consent to an investigation by HTC, and the Title IX Coordinator must weigh the request against the institution’s obligation to provide a safe, non-discriminatory environment for all members of its community. If HTC determines that an investigation is required, it must notify the reporting individuals and take immediate action as necessary to protect and assist them. HTC should seek consent from reporting individuals prior to conducting an investigation, and declining consent will be honored unless HTC determines in good faith that failure to investigate does not adequately mitigate a potential risk of harm to members of the community. If an individual discloses information through a public awareness event, HTC is not obligated to begin an investigation based on such information.
HTC will complete publicly available record-keeping and for purpose of Clery Act reporting and disclosure, without the inclusion of identifying information about the victim and maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of HTC to provide the accommodations or protective measures.

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

By only sharing personally identifiable information with individuals on a need-to-know basis, without the inclusion of identifying information about the victim, the institution will maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of HTC to provide the accommodations or protective measures.

8.0 RETALIATION

Retaliation is any kind of reprisal, adverse action, or negative action taken against an individual because he or she has:

- Complained about alleged discrimination, harassment or sexual assault as defined above,
- Participated as a party or witness in an investigation relating to such allegations, or
- Participated as a party or witness in a proceeding regarding such allegations.

Retaliation can occur contemporaneously during the complaint process or subsequent to it, once the retaliator is aware of the recipient’s participation in the process. Retaliation does not exist in the absence of an adverse action. An individual is protected from retaliation even when the complaint at issue is ultimately found to lack merit, as long as the complaint was made in good faith.
HTC does not allow, nor tolerate any conduct by any HTC member that may be regarded as retaliatory. Retaliation against any individual, whether said person submitted a complaint, will not be tolerated.

Upon the first instance of disclosure by a reporting individual to a HTC representative, the individual will be informed:

“You have the right to make a report to university police or campus security, local law enforcement, and/or state police or choose not to report; to report the incident to your institution; to be protected by the institution from retaliation for reporting that incident; and to receive assistance and resources from your institution.”

Reporting individuals or bystanders who report an incident of sexual assault in good faith will receive amnesty for drug and alcohol use.

Employees, faculty and students who violate HTC’s policies may be subject to disciplinary action. Individuals, who retaliate against someone who files a complaint, or against a witness, representative, or advocate for a complainant, will be subject to further disciplinary action.

9.0 ASSISTANCE FOR VICTIMS: RIGHTS & OPTIONS

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

- the survivor's right to report or not report the alleged incident to the higher education institution, law enforcement, or both, including information about the survivor's right to privacy and which reporting methods are confidential;
- the contact information for the higher education institution's Title IX coordinator or coordinators, confidential advisors, a community-based sexual assault crisis center, campus law enforcement, and local law enforcement;
- the survivor's right to request and receive assistance from campus authorities in notifying law enforcement;
- the survivor's ability to request interim protective measures and accommodations for survivors, including without limitation changes to academic, living, dining, working, and transportation situations,
obtaining and enforcing a campus-issued order of protection or no contact order, if such protective measures and accommodations are reasonably available, and an order of protection or no contact order in State court;

- the higher education institution's ability to provide assistance, upon the survivor's request, in accessing and navigating campus and local health and mental health services, counseling, and advocacy services; and
- a summary of the higher education institution's complaint resolution procedures.
- the procedures victims should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred;
- information about how the institution will protect the confidentiality of victims and other necessary parties;

- an explanation of the procedures for institutional disciplinary action

**Rights of Victims and the Institution's Responsibilities for Orders of Protection, “No Contact” Orders, Restraining Orders, or Similar Lawful Orders Issued by a Criminal, Civil, or Tribal Court or by the Institution**

HTC complies with Illinois law in recognizing orders of protection. Any person who obtains an order of protection from Illinois or any reciprocal state should provide a copy to the Office of the Title IX Coordinator. A complainant may then meet with Campus Security to develop a Safety Action Plan, which is a plan for administration and the victim to reduce risk of harm while on campus or coming and going from campus. This plan may include, but in not limited to: escorts, special parking arrangements, providing a temporary cellphone, changing classroom location or allowing a student to complete assignments from home, etc.) HTC cannot apply for a legal order of protection, no contact order or restraining order for a victim from the applicable jurisdiction(s).

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

It is very important that the victim preserve any proof or evidence of the criminal offense. Such incidents will be reviewed and investigated in an expedient and professional manner.
The federal laws require that both accuser and accused have the opportunity to object to HTC Participants as impartial.

**Procedures the College Will Follow When a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking is Reported**

HTC has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance and other services on and/or off campus as well as additional remedies to prevent contact between a complainant and an accused party, such as housing, academic, transportation and working accommodations, if reasonably available. HTC will make such accommodations, if the victim requests them and if they are reasonable available, regardless of whether the victim chooses to report the crime to the Title IX Coordinator or local law enforcement. Students and employees should contact the Title IX Coordinator Cheryl Karp at 847-982-2500.

Pursuant to the Illinois Preventing Sexual Violence in Higher Education law, HTC will provide a confidential advisor to survivors to help them understand their options and seek medical, legal and other services. The individual designated for this position will not be a “responsible employee” as defined by Title IX of the Education Amendments of 1972. All confidential advisors shall receive 40 hours of training on sexual violence, if they have not already completed this 40-hour training, before being designated a confidential advisor and shall attend a minimum of 6 hours of ongoing education training annually on issues related to sexual violence to remain a confidential advisor. Confidential advisors shall also receive periodic training on the campus administrative processes, interim protective measures and accommodations, and complaint resolution procedures.

Communications between a confidential advisor and a survivor shall consist of:

- Informing the survivor of the survivor's choice of possible next steps regarding the survivor's reporting options and possible outcomes, including without limitation reporting pursuant to the higher education institution's comprehensive policy and notifying local law enforcement.
- Notifying the survivor of resources and services for survivors of sexual violence, including, but not limited to, student services available on
campus and through community-based resources, including without limitation sexual assault crisis centers, medical treatment facilities, counseling services, legal resources, medical forensic services, and mental health services.

- Informing the survivor of the survivor's rights and the higher education institution's responsibilities regarding orders of protection, no contact orders, or similar lawful orders issued by the higher education institution or a criminal or civil court.
- Providing confidential services to and have privileged, confidential communications with survivors of sexual violence in accordance with Section 8-804 of the Code of Civil Procedure.
- Liaising with campus officials, community-based sexual assault crisis centers, or local law enforcement and, if requested, assist the survivor with contacting and reporting to campus officials, campus law enforcement, or local law enforcement (upon the survivor's request and as appropriate).
- Liaising with the necessary campus authorities to secure interim protective measures and accommodations for the survivor (upon the survivor's request).

If a report of domestic violence, dating violence, sexual assault or stalking is reported to HTC, HTC will follow the procedures above and outlined in Section 5.

10.0 **EXTERNAL REPORTING**

HTC will conduct a campus climate assessment every other year to ascertain general awareness and knowledge of the provisions of this policy, including student experience with and knowledge of reporting and college adjudicatory processes, which shall be developed using standard and commonly recognized research methods. The aggregate results of these campus climate assessments shall be posted on HTC’s website with no identifying information about respondents.

Members of HTC are always subject to local, state, and federal laws, and nothing in these procedures is intended to limit or postpone the right of an individual to file a complaint or charge with appropriate federal, state, or local departments or agencies.

It is the rights of victims and the responsibilities of all members of the community to comply with protective orders issued by a criminal, civil or tribal court or by HTC.
Among other options, students may contact the Office for Civil Rights of the U.S. Department of Education for inquiries concerning the application of Title IX as well as the implementation of its regulations. The Office for Civil Rights can be contacted using the following information:

Office for Civil Rights
U.S. Department of Education, Citigroup Center
500 W. Madison Street, Suite 1475
Chicago, IL 60661-4544
Phone (312) 730-1560
Fax (646) 428-3843
Email: OCR.Chicago@ed.gov

11.0 Policy on Monitoring Criminal Activity

HTC monitors and records criminal activity by students at non-campus locations of student organizations officially recognized by HTC, including student organizations with non-campus housing facilities through local police agencies.

12.0 Programs

All new students, including transfers, will attend a program about the provision of this policy and how to protect themselves against sexual assault. On at least an annual basis, Dean or his/her delegate at each of HTC’s sites will provide a formal educational program to increase awareness of sexual offenses, including rape, acquaintance rape, dating violence, domestic violence, sexual assault, stalking and other forcible and non-forcible sexual offenses.

HTC engages in comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end dating violence, domestic violence, sexual assault and stalking that:

- Are culturally relevant, inclusive of diverse communities and identities, sustainable, responsive to community needs, and informed by research, or assessed for value, effectiveness, or outcome; and
- Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community and societal levels.

The programs will include discussion of what constitutes these offenses, penalties for these offenses, definition of consent, prevention and awareness programs and ongoing prevention and awareness campaigns’ risk reduction
for students and faculty, safe and positive options for bystander intervention and security measures to protect against the occurrence of these offenses. HTC will advertise the date, time and content of these educational programs on posters displayed in those areas regularly used by students and employees of HTC.

13.0 **RESOURCES FOR SEXUAL HARASSMENT VICTIMS**

HTC will provide resources for sexual harassment victims, regardless of whether the victims choose to report the crime to campus police or local law enforcement. HTC will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations. These resources include but are not limited to:

- **Crisis Intervention Counseling**
  - In-person or telephone services which support clients and their families in their effort to cope with the trauma of victimization and provide assistance in the recovery process.

- **Emergency Assistance**
  - Counselors will work with clients to determine and meet immediate needs for mental health counseling, medical care, etc.

- **Accompaniment**
  - Security is available to provide support and escort around campus, and in certain instances to assist the individual in getting home.

- **Others**
  - Victims will have access to a sexual assault forensic examination with a nurse.
  - Available community resources will be provided based on client’s individual needs.

**Victim Assistance**

In cases of rape and/or sexual violence, there are many sources of support available to victims.

**On Campus**

- The Dorm Supervisor or Eim Bayit is available to work with the HTC community to meet immediate needs.
- HTC staff members are available to provide support and escorts around campus and in certain instances to assist the individual in getting home.
- Other available community resources may be provided based on student’s individual needs.
Off Campus

**ILLINOIS**
Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080

Chicago Domestic Violence Line: (877) 863-6338

Evanston Domestic Violence Line (YWCA): (877) 718-1868

Rape Victim Advocates
Main Office: 180 N. Michigan Ave, Suite 600, Chicago
(312) 443-9603
www.rapevictimadvocates.org

Chicago Metro Rape Crisis Hotline (YWCA)
Evanston 1215 Church St, Evanston
(847) 864-8445
www.ywca.org/evanston

Evanston Victim Services Program Evanston Police Department
1454 Elmwood Avenue, Evanston
http://www.cityofevanston.org/police/aboutus/police-social-services

Porchlight Counseling Services
(773) 750-7077 (confidential helpline and intake)
http://www.porchlightcounseling.org

**National**
- www.womenslaw.org
  - (707) 784-6844
- www.rainn.org
  - (800) 656-HOPE (4673)

**Israel**
- www.1202.org.il/English/
- +972-2- 623 2451

**EMERGENCY ACTIONS IN RESPONSE TO VIOLENCE**
Individuals who have experienced an act of violence, such as domestic violence, dating violence, sexual assault and/or stalking requiring immediate emergency assistance are advised to take the following actions:
- Get to a place of safety. Dial 911 for local Police or Dorm Supervisor (Skokie Campus)/ Eim Bayit (Chicago Campus) immediately if at continued risk.
- Seek any necessary medical attention as soon as possible.

**Nearby hospitals include:**
Evanston Hospital
2650 Ridge Avenue
Going to an Illinois hospital for medical care after an incident of sexual violence does not obligate an individual to file a report with the College or the police.

14.0 REGISTERED SEXUAL OFFENDERS

HTC makes available to the public over the Internet information about certain sex offenders required to register under Megan’s Law.

The federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000, requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation, volunteers services or is a student. The Illinois sex offender registry can be found at the following address:

https://www.isp.state.il.us/sor/ (Illinois)

Israel does not have a sex offender registry accessible to the public. There are specific vocational restrictions for sex offenders.

15.0 IMPLEMENTATION

This policy shall be implemented by the Office of the Chief Academic Officer.
16.0 SOURCE DOCUMENTS

- 34 CFR 106.8 and 106.9
- Revised Sexual Harassment Guidance: Harassment of Students By School Employees, Other Students, or Third Parties, dated January 19, 2001
- “Dear Colleague Letter” from the Assistant Secretary, U.S. Department of Education, Office of Civil Rights, dated April 4, 2011.

17.0 APPROVAL

This policy has been approved by the Office of the Chief Academic Officer and the Office of Institutional Compliance.