SAFETY & SECURITY AT HEBREW THEOLOGICAL COLLEGE

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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.

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 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.

In conjunction with at least one emergency management exercise each year, the College will notify the community of the exercise and remind the community of the information included in the College’s publicly available information regarding emergency response procedures.

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:
## Nature of Violation

### Responses for First-Time Violations May Include, But Are Not Limited To:
- Warnings
- Disciplinary Probation
- Counseling and treatment
- Service to the college community

### Responses for Repeat Violations May Include, But Are Not Limited To:
- 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

- Warnings
- Disciplinary Probation
- Counseling and treatment
- Service to the college community

## 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

## 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

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 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.).

Know the signs:
- 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: 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.retno.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 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.
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 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, 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:

  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.

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  

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

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

**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.
TITLE IX POLICY
Policies Concerning Sex Discrimination, Harassment and Complaint Procedure

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 is available to students, faculty, and staff. In addition, information about this policy will be 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 sex, including sexual harassment, should immediately contact the Title IX coordinator (designated in section 3.3, 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 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 Hebrew Theological College. This can include persistent comments or jokes about an individual’s gender; 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.

- 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 in section 5.22 below, or for any other reason will not be tolerated.

**Title IX Coordinator**
The Title IX Coordinator or 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.

Cheryl Karp  
Title IX Coordinator  
Hebrew Theological College  
7135 N. Carpenter Road  
Skokie, Illinois 60077  
Phone: (847) 982-2500 x150  
Email: karp@htc.edu

**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 (847) 982-2500 ext. 150. 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.

**Formal Investigation and Resolution of Discrimination, Harassment, or Retaliation Complaints**
- **Duty to Cooperate and Facilitate**
  All members of the Hebrew Theological College 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 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 and/or sexual discrimination 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. 150.

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. A complaint should include the following information:

a) Complainant’s full name, home address, email, and telephone number.

b) Name of the person against whom the complaint was made, including job title or student status, if known.

c) The protected status that is the basis for the alleged discrimination, harassment, or retaliation based on the complainant’s gender.

d) 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.

e) Complainant should include the term and year of his/her most recent active employment, academic, or student status within the college.

f) A student who is seeking admission to Hebrew Theological College should include the term and year in which he/she sought admission to the college.

g) The full name, address, and telephone number of complainant’s advisor or supervisor, if any.

h) The specific harm that resulted from the alleged act and the remedy sought.

i) The complainant’s signature and the date on which the complaint was submitted.

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.
• 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. 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 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. 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.

- 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) and the respondent (the accused) shall be informed of the Fact Finder’s decision
within ten 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.

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 (see Section 3.3 for contact information) or the appropriate office as required by the Fact Finder's decision.

**Grade Appeals**
Hebrew Theological College has a grade appeal process which is not circumvented by this policy. This procedure is not a substitute for a grade appeal.

**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.

**Retaliation**
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 above in section 5.22 or for any other reason will not be tolerated.

**Availability of Counseling**
As required under Title IX, Hebrew Theological College through its investigations and/or Title IX Compliance officer will offer its internal 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.

**External Reporting**
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
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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**HATE CRIMES STATISTICS**

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Note: There were no Hate Crimes reported during the years 2012 and 2014 on/in the Skokie Campus its residential facilities or public property. In 2013 there were no Hate Crimes on/in the Skokie Campus residential facilities or public property.

There were no Hate Crimes reports during the years 2012, 2013 and 2014 on/in the Chicago Campus, its’ residential facilities or public property.
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ANNUAL FIRE SAFETY REPORT
Appendix A
HEBREW 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 ILICIT 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>
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</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
o 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 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.

- 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.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)

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.
1.0 POLICY

HTC ("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.

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, 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. 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, 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
  o Any individual who provides the accuser or accused support, guidance, or advice.

• Consent with regards to sexual activity
  o Affirmative consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity.
  o 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.
  o Silence and lack of resistance do not constitute consent.

• Dating Violence
  o Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and
  o 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.
  o Dating violence does not include acts covered by the definition of domestic violence.

• Domestic Violence
  o 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
  o 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.
  o Does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim.

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

• Sexual Harassment
• Unwelcome sexual advances, requests for sexual favors, and, other visual, verbal or physical conduct of a sexual nature, when:
  o 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
  o 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
  o Unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature constituting sexual harassment.

• Sexual assault
  o 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.
  o 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.
  o Acquaintance rape is rape that involves people who know or are familiar with each other.

• Stalking
  o 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.
  o 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.
  o Substantial emotional distress is a significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.
  o A reasonable person is one under similar circumstances and with similar identities to the victim.

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

5.0 Procedures

Any member of HTC 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 HTC Policy and will notify the HTC Title IX Coordinator of such violations promptly.

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.

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.

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 will
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.

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.

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.

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 both are 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.

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.

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.

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.

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;
- 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.

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 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 day 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 the complainant, the party who filed the complaint or the alleged target of the sexual harassment, and the respondent, the accused, shall be informed of the fact finder’s decision in writing simultaneously, within ten days of the conclusion of the fact finder’s deliberation. They 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. They must be notified simultaneously and in writing of the outcome of the proceeding; appeal procedures; any change to the result before it becomes final; 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.

Reporting individuals and accused alike will be provided with at least one level of appeals.

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.

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.

6.0 SANCTIONS FOR VIOLATION

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 Personal Conduct Policy. 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 represent HTC in any capacity. Further violations while on probationary status will result in suspension or expulsion from HTC.
- **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. 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 Dean for re-enrollment.
- **Expulsion**: HTC may terminate a student's status at HTC 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 Vice President for Administration 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, 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.
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, or retaliation received.

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.

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 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 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.

9.0 AVAILABILITY OF COUNSELING

As required under Title IX, HTC through its investigations and/or Title IX Compliance officer will offer its internal counseling services to any complainant who has begun the complaint process. HTC will also provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, and other services, both within HTC and in the community. It is ultimately complainant’s decision of whether or not to accept the counseling service offered by HTC.

HTC will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within HTC and in the community.
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, the 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. The programs will include discussion of what constitutes these offenses, penalties for these offenses, definition of consent, prevention and awareness programs\textsuperscript{1} and ongoing prevention and awareness campaigns\textsuperscript{2}, risk reduction\textsuperscript{3} for students and faculty, safe and positive options for bystander intervention\textsuperscript{4} 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. Presentations will be made by guest speakers and appropriate members of HTC’s faculty and staff.

\section*{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 generally 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.

\section*{Off Campus Resources}

\textbf{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

14.0 REGISTERED SEXUAL OFFENDERS

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:

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 Vice President for Administration and
the Chief Academic Officer.
16.0 APPROVAL

This policy has been approved by the Chief Executive Officer.