



2020 Annual Security Report

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Campus Security and Crime Prevention Information

American Sentinel University complies with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act). Our policy is prepared in cooperation with local law enforcement agencies. Per the Clery Act, nothing in the law shall be construed to permit a school to retaliate, intimidate, threaten, coerce or otherwise discriminate against any individual.

The university attempts to provide students and employees with a safe and secure environment in which to study and work. American Sentinel's office is open during posted hours and is secured during times the school is not open. American Sentinel does not have a physical campus location or residential facilities for students.

Pursuant to federal law, American Sentinel University will make available to all students, employees and contractors annually the crime statistics for the most current academic year and the two preceding academic years. This information will be posted on the Department of Education website and will be communicated to students and employees annually.

Campus Security Authority

The Campus Security Authority personnel includes:

- Denver office – Location Facilities Director through CBRE, or in case of sexual misconduct, harassment the Title IX Coordinator and SVP, University Administration, People & Culture.
- Online Campus and Events: VP Student Engagement.

The appropriate Campus Security Authority will:

- Identify and confirm a significant emergency or dangerous situation exists.
- Notify the building security whenever a crime occurs on the campus property or non-campus property.
- File a report with the local police department when there is a theft of company property that has some type of traceable identification, or if there has been a pattern of thefts.
- Report homicide, rape, robbery, assault, illegal drugs and weapon possession to the local police department.
- American Sentinel University does not have any standing memoranda with local law enforcement agencies.

Crime Prevention Program and Office Security Measures

American Sentinel University's Crime Prevention program includes:

- All guests are requested to sign in at the 4th floor receptionist when visiting the headquarters office at 10065 E. Harvard Avenue, Suite 450, Denver, CO. 80231.
- An electronic access system is in place at the Denver facility. Access levels are restricted to only American Sentinel University and common entrance floors. The Facilities Department assigns and maintains the University's access card data base.
- Crime alert notices that pertain to the Denver facility are posted electronically by the Building Security operated by CBRE. This information will be reviewed and passed onto American Sentinel University employees.



- Employees are notified by posting notices at the facility when personal safety and/or when criminal patterns are noted near our Denver location.
- On occasion we will use video surveillance in selected common areas in the Denver facility.

Definition of Non-campus Buildings or Property

As a university offering programs of study online, American Sentinel University does not maintain on-campus buildings, property, or student housing facilities as defined by the Clery Act, and as such, the required disclosure requirements for this category do not apply. However, classroom spaces used by American Sentinel at required residences are non-campus buildings or property, for which the university is required to disclose the crime statistics and security policies detailed in this report.

As it relates to American Sentinel University, the Clery Act defines non-campus buildings or property as:

“Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.”

Reporting a Crime

If a student or employee is aware that a crime has been or is being committed on university property or at a school-sponsored event, the crime should be reported immediately to the local police and the campus security authorities. In an emergency, the local police department can be reached at 911.

The university does not tolerate violence or threatening conduct against any members of the university community. This includes criminal acts against people or property, as well as harassment based on race, ethnicity, culture, language, color, creed, religion, age, national origin, gender, sex, disability, sexual orientation, gender identification, veteran status, social economic class, genetic information, or status with regard to public assistance. The university will impose strict disciplinary actions and appropriately involve law enforcement officials should any acts of violence occur on university property or in the online environment. The university does not have a campus police or security department. The university works with local law enforcement agencies and refers criminal incidents to the local police department having jurisdiction over such matters.

Local Policy Department: City of Denver
1625 S. University Blvd., Denver, CO 80210
720-913-1300

State Police: Colorado
700 Kipling St., Lakewood, CO 80215
303-239-4501



As an online university we encourage you to work with your own local police departments when a crime has occurred. In addition to any criminal sanctions, the university will impose appropriate disciplinary sanctions if the offender is a student or employee of American Sentinel. The campus security authorities should be contacted if someone wishes to file a complaint.

The following Campus Security Authorities can be notified:

Abigail Blades, Compliance Specialist, compliance@americansentinel.edu

Kristine Zewe, SVP People and Culture, TitleIX@americansentinel.edu

Mary Adams, University President, Mary.Adams@americansentinel.edu

Devon Putnam, VP Student Engagement, Devon.Putnam@americansentinel.edu

Safe and Positive Options for Bystander Intervention

Bystanders are people who witness or have reason to believe that a crime has taken or will take place. Many bystanders ignore the situation because they do not want to get involved or fail to report the situation because they are afraid of retaliation. A crime can be reported anonymously at [Metro Crime Stoppers](#) or [Report a Crime Denver DA](#). American Sentinel University works with local law enforcement agencies to pull the crime report.

Retaliation

Retaliation or intimidation against an individual who has made a report or provided information in connection with an investigation is strictly prohibited. Individuals who participate in an investigation should be advised that university policy and federal law prohibits retaliation or intimidation against them or against individuals closely associated with them. The university will take steps to prevent retaliation or intimidation and will take disciplinary action against any party engaging in such behavior, up to and including suspension or dismissal from the university. An individual who feels that he or she has been subjected to retaliation or intimidation should report the incident to a member of the Campus Security Authority.

Confidentiality

All reports will be investigated as confidentially as reasonably possible, including reports of dating violence, domestic violence, sexual assault, and stalking. All participants in the investigation-including the Reporting Party, the Responding Party, and individuals interviewed by the Investigator-should keep the allegations and proceedings confidential and should provide information only to those university employees authorized to investigate the report or who otherwise have a legitimate need to know. Records are not kept publicly available. Any information identifying information about the reporting party will be excluded, to the extent permissible by law, to protect the Reporting Party's confidentiality. Federal law requires the university to publicly disclose statistics about reported incidents of sexual assault, domestic violence, dating violence, and stalking; however, no personally identifiable information is maintained or published for purposes of such reporting.



Disciplinary Proceedings

Upon written request, the university will disclose to the alleged victim of a crime of violence, hate crime, or a non-forcible sex offense the results of any disciplinary hearing conducted by the university against the student who is the alleged perpetrator. If the alleged victim is deceased as a result of the crime or offense, the university will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Crime Statistic Reporting Table

American Sentinel University moved from 2260 S. Xanadu Way, Ste. 310, Aurora, CO 80014 to a new physical location at 10065 E. Harvard Ave., Ste. 450, Denver, CO 80231 in January 2020. As this report covers time in both locations, the crime statistics for both locations are provided below:

Location: 1-mile radius surrounding American Sentinel University, 10065 E. Harvard Ave., Denver CO 80231

Offense	Year 2019 Within a one mile radius	On Campus Property	On Campus Student Housing Facilities	Non Campus Property	Public Property (sidewalks & public street surrounding building)
Murder / Non-Negligent Manslaughter	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0
Sexual Assault, Forcible	0	0	0	0	0
Sexual Offense, Other	3	0	0	0	0
Stalking	4	0	0	0	0
Domestic Violence	53	0	0	0	0
Hate Crimes	176*	0	0	0	0
Robbery/Larceny	25	0	0	0	0
Burglary	102	0	0	0	0
Aggravated Assault	62	0	0	0	0
Motor Vehicle Theft	167	0	0	0	1
Arson	4	0	0	0	0
Arrests: Weapons	9	0	0	0	0
Arrests: Drug Abuse Violations	12	0	0	0	0
Arrests: Liquor Law Violations & DUI	58	0	0	0	1

*Hate Crimes are reported for the entire state of Colorado, not just the one-mile radius around the American Sentinel University Office Building.

Statistics provided in conjunction with local law enforcement and www.communitycrimemap.com

Location: 1-mile radius surrounding 2260 S. Xanadu Way, Aurora CO 80014

Offense	Year 2019 Within a one mile radius	On Campus Property	On Campus Student Housing Facilities	Non Campus Property	Public Property (sidewalks & public street surrounding building)
Murder / Non-Negligent Manslaughter	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0
Sexual Assault, Forcible	2	0	0	0	0
Sexual Offense, Other	17	0	0	0	0
Stalking	8	0	0	0	0
Domestic Violence	110	0	0	0	0
Hate Crimes	176*	0	0	0	0
Robbery/Larceny	38	0	0	0	0
Burglary	121	0	0	0	2
Aggravated Assault	58	0	0	0	0
Motor Vehicle Theft	231	0	0	0	1
Arson	4	0	0	0	0
Arrests: Weapons	24	0	0	0	0
Arrests: Drug Abuse Violations	51	0	0	0	0
Arrests: Liquor Law Violations & DUI	49	0	0	0	0

*Hate Crimes are reported for the entire state of Colorado, not just the one-mile radius around the American Sentinel University Office Building.

Statistics provided in conjunction with local law enforcement and www.communitycrimemap.com

Community Crime Statistics

American Sentinel University also prepares annual crime statistics that are reported to law enforcement for the surrounding communities. These tables are located below for our two locations during this reporting period:

Table 1: Crime Statistics for Denver, Colorado, the new community in which American Sentinel is located as of January 2020.

City – Denver, CO

Year	Population	Violent Crime	Murder & Non Negligent Manslaughter	Rape	Robbery	Aggravated Assault	Property Crime	Burglary	Larceny & Theft	Motor Vehicle Theft	Arson
2016	699,259	4,597	57	567	1,160	2,813	25,101	4,675	15,638	4,788	94
2017	706,616	4,774	59	699	1,232	2,784	25,912	4,331	16,021	5,560	129
2018	720,745	5,262	65	717	1,211	3,269	26,464	3,982	17,207	5,275	116
2019*	-	2,452*	28*	333*	554*	1,537*	12,732*	1,717*	8,436*	2,579*	50*

*Data reported for first half of 2019 (January to June) FBI Preliminary Semiannual Uniform Crime Report

(<https://ucr.fbi.gov/crime-in-the-u.s/2019/preliminary-report>)

Table 2: Crime Statistics for Aurora, Colorado, the community in which American Sentinel was previously located through January 2020.

City – Aurora, CO

Year	Population	Violent Crime	Murder & Non Negligent Manslaughter	Rape	Robbery	Aggravated Assault	Property Crime	Burglary	Larceny & Theft	Motor Vehicle Theft	Arson
2016	366,477	1,939	22	289	576	1,052	11,213	1,698	7,977	1,538	69
2017	368,018	2,239	30	319	679	1,211	11,054	1,671	7,194	2,189	68
2018	372,824	2,716	17	387	631	1,681	11,122	1,723	7,189	2,210	53
2019*	-	1,290*	12*	216*	290*	772*	5,178*	642*	3,408*	1,128*	44*

*Data reported for first half of 2019 (January to June) FBI Preliminary Semiannual Uniform Crime Report (<https://ucr.fbi.gov/crime-in-the-u.s/2019/preliminary-report>)

Hate Crime Reporting

Hate Crime Statistics based on most recent 2018 FBI Uniform Crime Report (<https://ucr.fbi.gov/hate-crime>)

Location: Hate Crime Statistics for Denver, Colorado, the new community in which American Sentinel is located as of January 2020

- There were 30 reported hate crimes in 2018 for the city of Denver, CO.

Location: Hate Crime Statistics for Aurora, Colorado, the community in which American Sentinel was previously located through January 2020.

- There were 10 reported hate crimes in 2018 for the city of Aurora, CO.

Hate Crime Response and Prevention

U.S. Department of Education 34 CFR 668.46: The term “hate crime” is defined as a crime reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. For the purposes of this section, the categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability.

- American Sentinel University does not condone hate crimes or bias acts, as defined by 34 CFR 668.46 and is committed to providing an environment that is safe for all staff, faculty, students and visitors.
- For the health and well-being of the American Sentinel University community, it is essential that individuals or groups who feel targeted and/or affected by bias or hate acts can easily report incidents and receive services.



- If a student or office visitor witnesses any act that may be considered a hate crime or bias act (against him or herself, a fellow student or visitor, or another person), he or she should contact American Sentinel's Compliance Office immediately.
- American Sentinel's Compliance Office prepares an annual report of hate crimes. This information is posted on the American Sentinel website.

Compliance Office
10065 E. Harvard Ave., Ste. 450
Denver, CO 80231
Phone: 800.729.2427
Email: Compliance@americansentinel.edu

Sexual Offenses

American Sentinel University prohibits, and will not tolerate, discriminatory practices, sexual misconduct or the harassment/assault of any member of the university community, and pledges to seek out and minimize all forms of misconduct in its activities and programs.

University faculty, staff, students and contractors are responsible for assuring that the university maintains an environment for work and study free from sexual misconduct. Sexual misconduct violates the dignity of individuals and will not be tolerated. The university seeks to eliminate sexual misconduct through education and by encouraging faculty, staff, students, and contractors to report concerns or complaints. Prompt corrective measures will be taken to stop sexual harassment whenever it occurs.

Students and employees may look up registered sex offenders in the American Sentinel University's Clery geography on the [National Sex Offender Public Website](#).

Programs

The Title IX Coordinator has completed the Title IX Coordinator/Investigator Class through D. Stafford & Associates and supported by the National Association of Clery Compliance Officers and Professionals. American Sentinel University requires all employees to complete an annual Title IX training program. Students will also have access to this training. This program includes training on the definitions of dating violence, domestic violence, sexual assault, and stalking. It also includes detailed procedures the university will follow when one of these crimes is reported.

In addition, American Sentinel University has created a Title IX Handbook that addresses many of the issues related to sexual offenses. The handbook can be found on our public website's [student consumer information page](#) under "University Title IX and Security Guidelines."

Procedure for Institutional Disciplinary Action

Title IX sexual offenses can be reported by emailing the Title IX Coordinator at titleix@americansentinel.edu or filling out the confidential [Title IX complaint form](#). A qualified, unbiased university administrator will investigate reported violations. American Sentinel ensures confidentiality, amnesty, and leniency to any individual wishing to report a violation. Individuals can submit a complaint without fear of retaliation. More information about this procedure can be found in the [Title IX Handbook](#).

If a report of Sexual Misconduct involves potentially criminal acts, the complainant should be informed that he or she also has the option of reporting the incident to the nearest local Police Department and the option to be assisted by the Title IX Coordinator or other campus personnel in notifying law enforcement. The complainant should also be informed that he or she has the right to decline to notify law enforcement. In situations where criminal conduct is involved or personal safety is a concern, it is important that complainant preserve evidence as necessary to prove the crime occurred or secure a protective order through the court system.

- I. **Intake interview with complainant:** This preliminary assessment will determine whether there is enough evidence of a violation. A formal resolution is requested if there is reasonable cause of a violation. If there is no evidence of violation an informal resolution will be requested with possible interim measures.
- II. **Notice of formal investigation:** The Title IX Coordinator will notify complainant that complaint has been accepted for investigation and timeline for completion of the investigation. The complainant will be given an explanation and resources of their rights and options at this time. If necessary, American Sentinel University will work with the local police department in the investigation if brought in by the complainant.
- III. **Investigation conducted:** Witnesses are interviewed, information and evidence are gathered, and an investigation report is prepared and shared with both parties.
- IV. **Sanctions and findings:** The next appropriate course of action is determined. The university Title IX coordinator will then notify both parties of decision and next steps.
- V. **Resolution and disposition:** The Title IX Coordinator will make recommendations to appropriate executive officer for case resolution. The final disposition, with final decisions, is reviewed and approved.

Timely Warning Policy

The purpose for this policy is to establish a prompt alert to potentially dangerous criminal situations at or near our campus/workplace so that students and employees have the time and information necessary to take appropriate precautions. The Clery Act requires a timely warning be issued for any Clery Act crime that occurs within our Clery geography that is:

- Reported to the Safety Committee Lead, Compliance, Human Resources or local police agencies; and
- Is considered by the institution to represent a serious or continuing threat to students and employees.

Timely warnings can be issued for threats to persons or property. Clery geography for American Sentinel campus located at 10065 E. Harvard Ave., Denver CO 80231.

- Fourth Floor
- Elevators
- Stairwells (both)
- Parking lot



- Public property includes the public sidewalk and public street adjacent to the campus building as well as the public sidewalk adjacent to the public street.

Notification of a timely warning will be decided on case-by-case based on the facts surrounding a crime, including such factors:

- The nature of the crime.
- The continuing danger to the campus community.
- The possible risk of compromising law enforcement efforts.

When a crime notification is received and verified that the crime(s) may pose a threat to the safety or welfare of the campus community, American Sentinel will release a Timely Warning Notice. The timely warning notices will be distributed electronically.

If a student or employee has questions pertaining to the Timely Warning Policy, they may contact:

Kristine Zewe – Vice President, People and Culture (Kristine.Zewe@americansentinel.edu)

Abigail Blades – Compliance Specialist (Abigail.blades@americansentinel.edu)

Emergency Response Alerts and Procedures

American Sentinel University will identify and confirm significant emergencies or dangerous situations including but not limited to criminal activity and weather emergencies and will notify appropriate learners, staff, and faculty of potential threats and emergencies through various forms of communication, including e-mails or other media as appropriate. Notifications will be disseminated, without delay, unless issuing a notification may compromise efforts to assist a victim, or to contain, respond to, or otherwise mitigate the emergency.

Reportable Offenses

The following list of crimes is compiled in accordance with the definitions used in the Uniform Crime Reporting System of the Department of Justice, FBI, as modified by the Hate Crime Statistics Act and outlined by the Title IX Regulations and the Clery Act.

- Criminal homicide including murder and non-negligent manslaughter and negligent manslaughter.
- Forcible and non-forcible sex offenses (sexual harassment, sexual violence, domestic violence, dating violence, stalking, sexual exploitation, or indecent exposure).
- Robbery
- Theft
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson
- Hate crimes
- Arrests for drug law violations and illegal weapons possession

- Persons not arrested but referred for campus disciplinary action for liquor, drug and weapons law violations.
- Sexual violence
- Domestic violence
- Dating violence
- Stalking
- Sexual exploitation
- Indecent exposure

Additional reportable offenses include:

- Attempted motor vehicle theft
- Vandalism
- Simple assault
- Intimidation

Monitoring Student Criminal Activity Off Campus

Because American Sentinel University is an online institution, off-campus learner criminal activity is not monitored. However, should American Sentinel University become aware that a student has been alleged to have committed a crime or has been convicted of a crime, American Sentinel University will follow all applicable laws pertaining to the investigation and/or reporting of such allegations or court findings.

Drug and Alcohol Abuse Prevention

American Sentinel University is committed to providing students and employees an environment free of alcohol and drugs. The unlawful possession, use or distribution of drugs or alcohol on property owned, leased, used or rented by American Sentinel University is strictly prohibited. Use of alcohol at American Sentinel-sponsored events—other than those where alcohol is provided – is prohibited.

American Sentinel University will cooperate fully with local, state and federal law enforcement agencies.

Health Risks

The risks associated with the use of drugs and alcohol is numerous and may include physical and mental impairment, emotional and psychological deterioration. To learn more about the health risks associated with drugs and alcohol abuse please visit [the National Institute on Drug Abuse website](#).

Treatment and Prevention Resources

Information about drug and alcohol prevention, counseling, treatment and rehabilitation, and re-entry programs can be provided by one of the community organizations below. Additional programs may be listed in local and other area telephone directories.



Al-Anon Family Group Headquarters, Inc.

1600 Corporate Landing Parkway, Virginia Beach, VA 23454-5617

Tel: (757) 563.1600

Email: wso@al-anon.org

<http://www.al-anon.org>

A.A. World Services

475 Riverside Drive at West 120th St. 11th Floor, New York, NY 10015

Tel: (212) 870.3400

<http://www.aa.org>

United Way

Mile High United Way, Inc.

711 Park Avenue West, Denver, CO 80205

Tel: (303) 433.8383

<http://www.unitedwaydenver.org>

Information and Referral Phone Number: 211

Organization Number: 07050U

Narcotics Anonymous World Services

PO Box 9999, Van Nuys, CA 91409

Tel: (818) 773-9999

<http://www.na.org>

American Sentinel University Will Impose Sanctions for Alcohol or Drug Violations

Violations of this policy may lead to disciplinary action, up to and including expulsion from the university, immediate termination of employment, and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

Students who violate city, state, or federal laws will be reported to the appropriate law enforcement officials. Students subject to these sanctions will be afforded all due process rights to which they are entitled by law and under our Code of Student Conduct.

Employees with questions about this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or the SVP, University Administration, People & Culture without fear of reprisal.

A paper copy of this report may be requested from Compliance@americansentinel.edu.

University policies for Campus Security and Crime Prevention, Drug and Alcohol Abuse Prevention and Hate Crime Response and Prevention can also be located at:

<http://www.americansentinel.edu/about-american-sentinel-university/student-consumer-information>

Definitions

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

Assault: The commission of an act with the intent to cause fear in another of immediate bodily harm or death, or the intentional infliction or attempt to inflict bodily harm upon another.

- Simple Assault: All assaults which do not involve the use of a firearm, knife, cutting instrument, or other dangerous weapon and in which the victim did not sustain serious or aggravated injuries.
- Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury.

Burglary: The unlawful entry of a structure to commit a felony or theft.

Clery Geography: Clery geography includes—

- (A) Buildings and property that are part of the institution's campus;
- (B) The institution's non-campus buildings and property; and
- (C) Public property within or immediately adjacent to and accessible from the campus.

Consent: The affirmative, unambiguous, and voluntary agreement to engage in a specific sexual activity during a sexual encounter.

Dating: Social or romantic relationships that are casual or serious, monogamous or non-monogamous, and of long or short duration.

Dating Violence: Dating violence is committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship is determined based on the length of the relationship, and frequency of interaction between the persons involved in the relationship. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.

Destruction/damage/vandalism of property: To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law. Attempts are included.

Discrimination: The segregation, separation, or disparate treatment of individuals based on gender, age, race, creed, national origin, gender identity, religion, disability, sexual orientation, marital status, or status with regard to public assistance. Discriminatory practices include any instances of treatment or behavior that interfere with an individual's full participation in the university, such as discouraging course participation or other activities designed to inhibit progress in a program of study.

Domestic violence: The use, attempted use, or threatened use of physical force, or a weapon; or the use of coercion or intimidation; or committing a crime against property by a current or



former spouse, parent, or guardian of the victim; a person with whom the victim shares a child in common; a person who is or has been in a social relationship of a romantic or intimate nature with the victim; a person who is cohabiting with or has cohabited with the victim as a spouse, parent, or guardian; or by a person who is or has been similarly situated to a spouse, parent, or guardian of the victim.

Drug law violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

Fondling: The touching of private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is capable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.

Harassment: Harassment encompasses any unwanted behavior that results in a hostile environment.

Incest: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct but without displaying a weapon or subjecting the victim to actual physical attack.

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

Liquor law violations: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages.

Motor vehicle theft: The theft or attempted theft of a motor vehicle.

Murder/Nonnegligent manslaughter: The willful (nonnegligent) killing of one human being by another.

Prohibited conduct: Prohibited conduct includes consensual relationships, dating violence, domestic violence, discrimination, harassment, sexual harassment, stalking, and retaliation, as defined in this policy, provided that conduct either a) occurs at an American Sentinel faculty, office, internet course room, or vehicle; b) occurs at or in connection with a course or other university-sponsored event; or c) is alleged to have created a hostile environment in a course room or other university sponsored event.

Retaliation: Retaliation is an adverse action taken in retribution for one's reporting or supporting an allegation of prohibited conduct, where the allegation is made in good faith.

Robbery: The taking of attempting to take anything of value from the care, custody, or control of person or persons by force or threat of force or violence and/or by putting the victim in fear.

Sanction: A sanction is a disciplinary action that may result from prohibited conduct.

Sexual Assault: an offense that meets the definition of rape, fondling, or statutory rape as used in the FBI Uniform Crime Reports.

- Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This definition includes any gender of victim or respondent.
- Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
- Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Sexual Harassment

Sexual harassment includes unwelcome sexual advances, sexual assault, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including but not limited to the following:

- Conduct that interferes with an individual's academic performance, or creates an intimidating, hostile, or offensive academic environment.
- Unwelcome, unnecessary, or coerced touching, kissing, grabbing, hugging, cornering, or other physical contact that is of a sexual nature or is sexually motivated.
- Unwanted sexual compliments or comments.
- Demand for sexual favors accompanied by implied or overt threats concerning employment, grades, compensation, tangible benefits, or recommendations.
- Unequal academic or employment performance standards, discipline, or work regulations because of sex.
- Deliberate or careless use of offensive or demeaning language that has a sexual connotation.
- Deliberate or careless dissemination of materials such as cartoons, articles, pictures, or graffiti that have sexual content, which are not necessary for the academic environment, and which are offensive to learners or employees.

Stalking: Stalking is engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress.

University Administrator: A university administrator is a university employee who holds a position of responsibility at a supervisory or managerial level, or higher. For purposes of faculty, university administrator refers to a faculty member holding the position of faculty chair or higher.

Procedures

Reporting of suspected prohibited conduct

- A. Anyone may report an instance of alleged prohibited conduct to the individual below or by filling out the following form: <https://form.jotform.com/202033949527154>
 - a. Compliance, compliance@americansentinel.edu
 - b. Human Resources, human.resources@americansentinel.edu
 - c. Title IX Coordinator, titleix@americansentinel.edu
- B. Upon receipt of an allegation, the complaint will be reviewed to determine if the complaint falls under Title IX or under another University Policy.
- C. An allegation of prohibited conduct under this policy must include
 - a. The individual(s) against whom the alleged prohibited conduct is directed
 - b. A brief description of the alleged prohibited conduct, including the date(s), time(s), and place(s)
 - c. The corrective action recommended
- D. In the event of a factual dispute at any stage of these procedures, and which follows the report of alleged prohibited conduct, the burden is on the alleged victim to establish that his or her version of the events in question is more likely true than not true.
- E. If at any stage of these procedures the alleged complainant requests that the complaint not be pursued, that request will be honored.
- F. If at any stage of these procedures the alleged victim requests anonymity, good faith efforts will be undertaken to act consistent with that request. However, the university administrator is advised that the ability to maintain anonymity while pursuing a claim under this policy is limited.
- G. The alleged victim maintains the right to notify law enforcement, including local police, at any time or to refrain from contacting such authorities. The alleged complainant also maintains the right to seek an order of protection, no-contact order, restraining order, or similar lawful order from any court with jurisdiction. Upon the alleged complainant's request, American Sentinel will assist the alleged complainant(s) in notifying law enforcement authorities. American Sentinel at all times retains the right to notify law enforcement, at its discretion, to protect its students and/or employees.
- H. A notice document will be delivered to the Complainant within 10 days of the reported incident. The notice will include information about the investigation process, the allegations at hand, the complainant's and respondent's rights, the policy that

alleged behavior violates and contact information for the investigator, and University supportive measures.

Initial resolution process

- A. The initial resolution process shall be administered by the Compliance Office. The Compliance Office will consult with Human Resources when a faculty member or employee is involved.
- B. Upon receipt of an allegation, the Compliance Office will determine whether the allegation as stated constitutes an allegation of prohibited conduct under this policy. If the Compliance Office determines that the allegation does not contain alleged prohibited conduct under this policy, there will be no further proceedings under this policy.
- C. The Compliance Office may attempt to informally bring the matter to resolution, except in allegations involving alleged sexual assault, dating violence, domestic violence, a hate crime, or stalking. However, the complainant at all times retains the right to refuse informal resolution.
- D. If an informal resolution is not reached, the allegation will be sent to an independent review panel or human resources for investigation and review.

Investigation and Review

- A. Allegations of prohibited conduct under this policy will be investigated by an independent review panel if the complainant is a student and if, by American Sentinel Human Resources Department, the complainant is an employee or contractor.
- B. Allegations will receive a prompt, fair, and impartial investigation and resolution. Investigations of alleged prohibited conduct will include:
 - a. Notification to the respondent of the allegation of prohibited conduct.
 - b. An opportunity for both the complainant and the respondent to submit any writing, information, evident, and/or witnesses supporting or refuting the allegation.
 - c. An opportunity for both the complainant and the respondent to be heard by teleconference.
- C. Both the complainant and the respondent will be entitled to have the same opportunities to have others present on the teleconference, including the opportunity to be accompanied on the call by an advisor of their choice.
- D. Following the investigation, the independent review panel and/or human resources will consider the complainant's and respondent's submissions, any teleconference statements, and any other evidence found during the course of the investigation.

- E. The independent review panel and/or human resources will determine whether prohibited conduct has occurred and will issue a decision, including sanctions, if any, no later than 60 days after receipt of the matter from the Compliance Office, unless the alleged victim requests extension, or circumstances beyond American Sentinel University's control require extension.
- F. Compliance facilitates communication between the independent review panel or human resources and the parties. Once a recommendation is reached, Compliance will report the decision and any appeal opportunities to the Office of the President.
- G. Once final determination is reached by the Office of the President the Director of Compliance will report the decision and any appeal opportunities to the alleged victim and the respondent in writing, simultaneously.
- H. The complainant and the respondent have the right to appeal the decision.

Appeal Process

If either party chooses to appeal the initial decision, he or she must submit a formal, written appeal request to the Office of the President. The appeal request must be submitted by mail or email and within 10 calendar days of being sent notification of the decision.

- A. The president or president designee will receive the review the record developed at the investigation and review stage. In addition, at his or her sole discretion, the president or president designee may accept or reject any evidence not presented at the investigation and review stage of the appeal process.
- B. Following the review, the president or president designee will issue a decision and report it to the complainant and the respondent as soon as practicable. Decision shall be issued no later than 60 calendar days after receipt of appeal, unless the complainant requests an extension or circumstances beyond the university's control require an extension. The president or president's designee may affirm or reverse the decision, in whole or in part, or may issue a new decision.
- C. The decision of the president or president designee is final and will be communicated in writing to the alleged victim and respondent simultaneously.
- D. A record of the final decision and all related materials will become part of the respondent's official academic record and upon request, will be made available to the Board of Trust.

Additional procedures for reporting a consensual relationship

- A. Any reported cases of a consensual relationship involving an employee will be reported to human resources.
- B. If American Sentinel University determines a prohibited consensual relationship exists, the employee's position of authority with respect to the specific student at issue will be adjusted to eliminate the existence of the prohibited consensual



relationship. Resolution of any discrimination, harassment, or assault resulting from the consensual relationship will be handled according to the procedures above.

For additional information pertaining to employees regarding this topic, please refer to the American Sentinel Employee Handbook and/or contact Human.Resources@AmericanSentinel.edu