

MOUNT CARMEL
College of Nursing

2023 ANNUAL SECURITY REPORT

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For more information related to anything in this Annual Security Report, or to request a printed copy, contact:

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(614) 234-2341

mjoseph-kemplin@mccn.edu or compliance@mccn.edu

Policy for Reporting the Annual Disclosure of Crime Statistics

Mount Carmel College of Nursing (MCCN) has prepared this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act), in cooperation with Mount Carmel Health System Safety & Security, the Fairfield Medical Center (FMC) Police and local law enforcement agencies surrounding the Columbus and Lancaster campuses. This Annual Security Report (ASR) includes statistics for the previous three years concerning reported crimes that occurred on all MCCN campuses, on public property within or immediately adjacent to and accessible from each campus, and on non-campus buildings/property. The report also includes institutional policies concerning campus security and other matters.

Each year, the College provides email notification to all faculty, staff, and enrolled students of the website where this report is available online. These notifications include a statement of the report's availability, a link to the exact URL where the ASR is located, a brief description of the report's contents, and a statement that the College will provide a paper copy of the ASR upon request. Prospective students and employees are notified of the availability of the report. Any request for a copy shall be made by contacting the Director of Compliance and Safety in the College of Nursing at compliance@mccn.edu or 614-234-2341, and it will be provided at no cost.

Emergency Contact Numbers

EMERGENCY	911
Mount Carmel Safety & Security Department	(614) 234-4831
Fairfield Medical Center Police Department	(740) 687-8019
Title IX Coordinator/Director of Compliance and Safety	(614) 234-2341
<i>Additional Local Resources</i>	
<i>City of Columbus Alcohol and Drug Abuse Program</i>	(614) 645-6839
<i>Sexual Assault Response Network of Central Ohio (SARNCO)</i>	(614) 267-7020
<i>Mount Carmel Crime and Trauma Assistance Program</i>	(614) 234-5900
<i>Spring Health Wellbeing Services for MCCN Colleagues</i>	trinityhealth.springhealth.com
<i>Virtual Care Group 24/7/365 Counseling and Wellness for Students</i>	www.thevirtualcaregroup.com/mccn

Daily Crime Log

A copy of the daily crime-fire log is available for public inspection from the College Director of Compliance and Safety. Information on viewing can be obtained by calling 614-234-2341 or emailing compliance@mccn.edu.

Clery Geography

These figures include reports of crimes occurring on campus, non-campus buildings or properties, and public property. These geographic areas are defined as follows:

Campus

1. Any building or property owned or controlled by MCCN within the same reasonably contiguous geographic area and used by MCCN in direct support of, or in manner related to, MCCN's educational purposes, and
2. Any building or property that is within or reasonably contiguous to the area identified in paragraph (1), that is owned by MCCN but controlled by another person, is frequently used by students, and supports institutional purposes (such as food or other retail vendor).

Non-campus building or property

1. Any building or property owned or controlled by a student organization that is officially recognized by MCCN; or
2. Any building or property owned or controlled by MCCN that is used in direct support of, or in relation to, MCCN's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of MCCN.

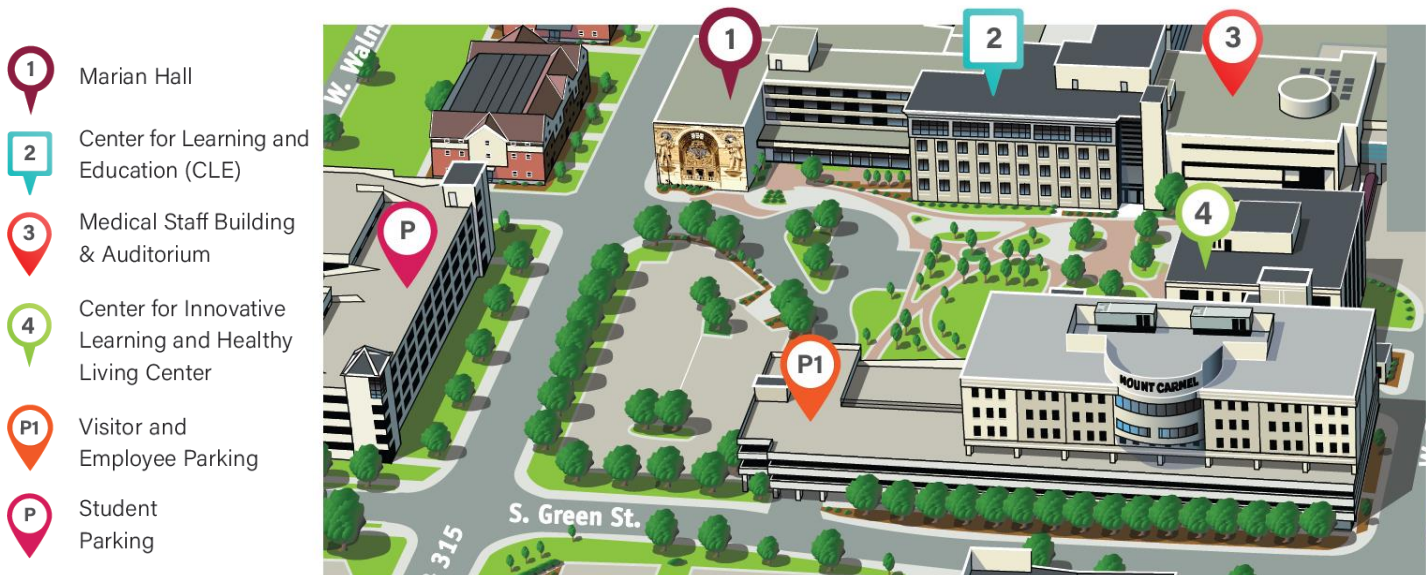
Public Property

According to the Clery Act definition, "public property" is defined as all public property that is within the same reasonably contiguous geographic area of the institution, such as a sidewalk, a street, other thoroughfare, or parking facility, and is adjacent to a facility owned or controlled by the institution if the facility is used by the institution in direct support of, or in a manner related to the institution's educational purposes.

Campus Maps

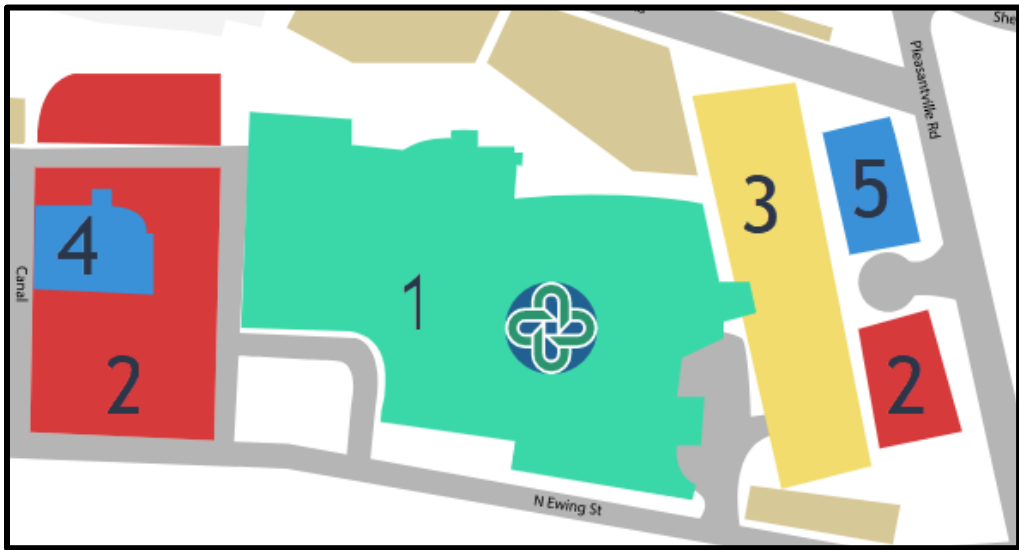
The following maps provide a visual depiction of both the Columbus main campus and the Lancaster campus. They show the Campus and Public Property categories, as defined above, for each campus. MCCN does not have any Non-campus property as defined by the Clery Act.

Columbus



Notes: The building on top of Parking Garage (P1) is not owned by the College nor used in College programs. It is therefore not part of the campus geography.

Lancaster



- 1. Fairfield Medical Center
- 2. Parking Lot
- 3. Parking Garage
- 4. FMC Office Pavilion
- 5. Fairmore Center

MCCN Campus Security Crime Statistics

MCCN Main Campus (Columbus)

Campus Security Act Reporting, 2020-2022

	MCCN MAIN CAMPUS			PUBLIC PROPERTY			NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
MURDER/NON-NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
RAPE	0	0	0	0	0	0	0	0	0
FONDLING	0	0	0	0	0	0	0	0	0
STATUTORY RAPE	0	0	0	0	0	0	0	0	0
INCEST	0	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Hate Crime Reporting MCCN Main Campus (Columbus), 2020-2022

"Hate crimes" (crimes of prejudice) are to be reported according to category of prejudice for the specified crimes in which the victim is intentionally selected because of the perpetrator's bias against the victim based on the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, disability, gender identity or national origin of the victim. Hate crimes include: murder-negligent manslaughter; negligent manslaughter; rape; fondling; incest; statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; arson; and larceny-theft; simple assault; intimidation; and vandalism and property crimes, etc. in instances where the victim is intentionally selected because of the perpetrator's bias against the victim.

There were no reported hate crimes on campus, in residential facilities, non-campus or public property for the years 2020-2022.

There were no reported crimes on campus, in the residential facilities, non-campus or on public property that were determined to be unfounded for the years 2020-2022

Violence Against Women Act

	MCCN MAIN CAMPUS			PUBLIC PROPERTY			NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
DOMESTIC VIOLENCE	0	0	0	0	0	0	0	0	0
DATING VIOLENCE	0	0	0	0	0	0	0	0	0
STALKING	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Arrests

	MCCN MAIN CAMPUS			PUBLIC PROPERTY			NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
LIQUOR LAW ARRESTS	0	0	0	0	0	0	0	0	0
DRUG LAW ARRESTS	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION ARRESTS	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Disciplinary Actions

	MCCN MAIN CAMPUS			PUBLIC PROPERTY			NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
LIQUOR LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0
DRUG LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0

Lancaster Campus – Fairfield Medical Center (FMC)

Campus Security Act Reporting, 2020-2022

	MCCN LANCASTER CAMPUS			FMC PUBLIC PROPERTY			FMC NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
MURDER/NON-NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
RAPE	0	0	0	0	0	0	0	0	0
FONDLING	0	0	0	0	0	0	0	0	0
STATUTORY RAPE	0	0	0	0	0	0	0	0	0
INCEST	0	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Hate Crimes Reporting - Lancaster, 2020-2022

"Hate crimes" (crimes of prejudice) are to be reported according to category of prejudice for the specified crimes in which the victim is intentionally selected because of the perpetrator's bias against the victim based on the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, disability, gender identity or national origin of the victim. Hate crimes constitute: murder-negligent manslaughter; negligent manslaughter; rape; fondling; incest; statutory rape; robbery; aggravated assault; burglary; motor vehicle theft; arson; and larceny-theft; simple assault; intimidation; and vandalism, property crime, etc. in instances where the victim is intentionally selected because of the perpetrator's bias against the victim.

There were no reported hate crimes on campus, non-campus or public property for the years 2020-2022.

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Violence Against Women Act

	MCCN LANCASTER CAMPUS			FMC PUBLIC PROPERTY			FMC NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
DOMESTIC VIOLENCE	0	0	0	0	0	0	0	0	0
DATING VIOLENCE	0	0	0	0	0	0	0	0	0
STALKING	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Arrests

	MCCN LANCASTER CAMPUS			FMC PUBLIC PROPERTY			FMC NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
LIQUOR LAW ARRESTS	0	0	0	0	0	0	0	0	0
DRUG LAW ARRESTS	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION ARRESTS	0	0	0	0	0	0	0	0	0

There were no reported crimes on campus, non-campus or on public property that were determined to be unfounded for the years 2020-2022.

Disciplinary Actions for the Lancaster Campus

	MCCN LANCASTER CAMPUS			FMC PUBLIC PROPERTY			FMC NON-CAMPUS		
	2022	2021	2020	2022	2021	2020	2022	2021	2020
LIQUOR LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0
DRUG LAW VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION VIOLATIONS REFERRED FOR DISCIPLINARY ACTION	0	0	0	0	0	0	0	0	0

Reporting Crimes and Incidents

Reporting a Crime

In the event of an emergency, dial 911.

Mount Carmel College of Nursing encourages anyone who is the victim of or witness to any crime to promptly report the incident to the Columbus Police Department, Mount Carmel Franklinton (MCF) Safety and Security, Fairfield Medical Center (FMC) Police, or the Lancaster Police Department.

All reports will be investigated. Voluntary, confidential reporting of crimes may occur when the crimes are reported to our College Counselor and when the reporter is in a treatment relationship with the College Counselor. Except for that particular circumstance, violations of the law will be referred to Columbus Police, FMC Police, Lancaster Police Department, MCF Security, and campus security authorities, where appropriate.

Reporting a Crime on MCCN Main Campus (Columbus)

To report a criminal offense, contact MCF Security at 614-896-1489, the College front desk in Marian Hall at 614-234-5800. The MCF Safety & Security Office is in the Healthy Living Center (Building 4 on the Campus Map) at MCF.

Reporting a Crime on the Lancaster Campus

Students on the FMC campus should notify FMC Police at 740-687-8019. FMC Police is located at 401 N. Ewing St., Lancaster, OH, 43130.

Confidentiality

Mount Carmel College of Nursing provides for voluntary confidential reporting of crimes only when crimes are reported to our counselors with the Virtual Care Group, or under certain circumstances, to a physician or nurse at Virtual Care Group or a hospital. Some off-campus reports such as those to clergy members or some healthcare professionals may also be legally confidential pursuant to state law.

Reports that are confidential by law will not be reported to the College for inclusion in the annual crime statistics report. MCCN does not have a policy that permits confidential reporting of crimes for inclusion in the annual crime statistics report. The extent to which the College can protect the identity of victims of sex-based offenses contained in police reports is not absolute; however the College uses its best efforts to protect the identity of the victim and the intimate details of the report. The identity of an uncharged suspect may be withheld.

Campus Security Authorities

The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

Director of Compliance and Safety Title IX Coordinator	Mitch Joseph-Kemplin	614-234-2341
Supervisor, Safety and Security	Michael Nance	614-234-5290

Security Practices and Procedures

Security Awareness Programs

Throughout the summer and academic year, both Columbus and Lancaster campus students come together for orientation (or participate virtually) and are informed of services offered by MCF Safety & Security. Lancaster students are provided additional information about FMC police force services at a separate orientation at FMC.

The ASR is posted on the College website for all students, faculty, staff and the general public, under “About Us” and then under the “Consumer Information Details” navigation link (<http://mccn.edu/pdf/asr-fire-safety-report.pdf>). The ASR contains current crime and fire statistics for Mount Carmel College of Nursing.

In addition, College staff and MCF Safety and Security organize periodic programs on campus that address student and colleague safety. Program schedules are communicated to students via CARMELink announcements, student email messages, the monthly student newsletter, and bulletin boards located in common areas on the campus. Communications to employees are made via the College-wide email system or the Mount Carmel Health System Intranet.

General Safety Precautions

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibilities for their own safety and the safety of others. To enhance personal safety, MCF Safety & Security officers are available to escort students to and from their vehicles. Students and employees are encouraged to use this service after dark. FMC Police Department officers are also available to escort students to and from their vehicles. Students and employees are encouraged to use this service after dark or at any time they feel unsafe.

Members of the College community at both the MCCN main and FMC campuses are encouraged to assume responsibility for their own personal safety, and security of personal belongings, by taking the following simple, common sense precautions.

- Although both campuses are well lighted, do not walk alone after dark.
- Keep purses/billfolds and other valuables with you or stored in a campus locker.
- Do not record your address on your key ring.
- Do not provide personal identifying information over the phone.
- Do not loan your MCCN ID Badge to anyone – even fellow students.
- Do not prop doors or hold them open.
- Report any potential fire hazards or broken equipment to the MCF Safety & Security.

Missing Student Policy

If a member of the MCCN community has missed three consecutive days of classes without any known reason or response, they should immediately contact the Director of Compliance and Safety, who will then make contact with following administrators as necessary:

- Director of Compliance and Safety, 614-234-2341
- College President, 614-234-4340
- Academic Dean, 614-234-1777
- Director, Records and Registration, 614-234-5685
- Safety and Security, 614-896-1489 OR 614-896-1489

The Director of Compliance and Safety, in coordination with other campus authorities, will immediately notify other appropriate law enforcement agencies upon receipt of a missing student report. If the Law Enforcement agency makes an official determination that a student is missing, emergency contact procedures will be initiated within 24-hours in accordance with the student's designation. In addition, College administrators or their designees will be notified to include the Director of Records and Registration and Director of Compliance and Safety.

Student Emergency Contact Information

Each student may register contact information to be notified in the event the student is determined to be missing. Student contact information will be registered confidentially, will be accessible only to authorized College officials and may not be disclosed except to law enforcement personnel in furtherance of a missing person investigation.

If a missing student is under 18 years of age and is not emancipated, MCCN is required to notify their custodial parent or guardian within 24-hours after the student is determined to be missing, in addition to notifying any additional contact person designated by the student.

Law Enforcement Authority and Jurisdiction

Mount Carmel College of Nursing (MCCN) is a subsidiary corporation of Mount Carmel Health System. MCCN Columbus campus is located on the Franklinton campus of Mount Carmel Health System where the MCF Safety and Security Office provides services for MCCN. The MCF Safety & Security Department is maintained by Mount Carmel Health System and not by MCCN. The College Director of Compliance and Safety attends regularly scheduled meeting with the MCF and Mount Carmel Grove City (MCGC) Safety and Security team.

The Lancaster campus is located on the campus of Fairfield Medical Center (FMC) in Lancaster, Ohio, where the FMC Police Department provides services for FMC. The FMC Police Department is maintained by Fairfield Medical Center and not by MCCN.

MCF Safety & Security and FMC Police have the authority to ask persons for identification and to determine whether individuals have lawful business at the College or at FMC.

MCF Safety & Security and FMC Police can and do respond to student-related incidents that occur on campus. MCF Safety & Security and FMC Police also have direct communication with local police, fire department, and ambulance services to facilitate rapid response in any emergency situation. Designated Safety and Security Officers are trained or certified in the following areas:

Crime Prevention	Crisis Intervention	Hazmat responders
Active Shooter	Fire Prevention	CPR
Aggression managers	Bomb Awareness	

Emergency Response

Emergency Response Procedures

To report an emergency:

- MCF Safety & Security: 614-234-4831 or 614-896-1489
- Fairfield Medical Center Police: 740-687-8019
- Police or Fire: 911

Mount Carmel Franklinton Safety & Security ("MCF Security"), the Fairfield Medical Center ("FMC") Police and the College President receive information from various offices and departments on and off campus. If MCF Security or one of these offices confirms that there is an immediate threat to the health or safety of some or all of the members of the campus community, MCF Security or FMC Police and the President/Dean of the College will determine the content of the message and either or both entities will use some or all of the methods described below to communicate to the campus community or appropriate segment of the campus community.

The emergency messaging system may be initiated from on-campus and from remote locations. The College will, without delay and taking into account the safety of the community, determine the content of the emergency message and initiate the emergency messaging system, unless issuing a message will, in the judgment of the MCF Security, the Police or other responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency situation.

Code	Description
ADAM	Infant/Child Abduction: An infant has been taken without authorization or a child has been taken and/or is missing.
YELLOW	Disaster: There has been a disaster. An internal disaster can have significant effects on hospital operations. An external disaster occurs in the community and will directly affect the campus.
RED	Fire: Fire is discovered or the fire monitoring system has been activated.
BLACK	Bomb: A bomb threat has been received or a suspicious object has been found at a Mount Carmel facility
GRAY	Severe Weather: Conditions are right for severe weather to occur (tornado, winter storm, etc.) or severe weather is present or has been sighted in the immediate area.
ORANGE	Hazardous Material Spill: A hazardous chemical/ material has been released and must be contained. This code will be followed with an Indoor or Outdoor designation.
BLUE	Medical Emergency: A medical emergency occurring that requires immediate attention (age 13 and older).
PINK	Pediatric Medical Emergency: A pediatric medical emergency is occurring that requires immediate attention (age 12 and younger).
VIOLET	Violent Person: Someone is acting in a violent manner.

SILVER	Person with Weapon/Hostage: A person has a gun or an individual has been controlled and held against his/her will by another.
BROWN	Missing Adult Patient: An adult patient is missing.
EVAC	Evacuation: It is necessary to remove patients, staff members, and other people from an area or the entire facility
UTILITY	Loss of Utilities: A utility service has been lost or interrupted.

Emergency Notification System – Notification of Immediate Threat

The College maintains multiple systems for alerting the College community about campus emergencies and will use some or all of those systems, depending on the circumstances. The College provides emergency notification services to the College community via cell phone text messages and email. These notices may also be posted to the College website and social media. MCCN Rave Alert is available to all students, faculty, and staff. Their emails and phone numbers are automatically registered in the system.

Emergency messaging will primarily be used only for those situations that pose an immediate threat to the health or safety of students or employees on campus or for the closing of an entire campus or cancellation of classes (i.e., severe weather, chemical spills, fires, and crimes).

Messages about criminal activity generally will not be sent using these systems unless it is required by the Clery Act or decided there is an imminent threat of danger. In those cases where a crime has been reported and MCF Security and/or the Police determine that although there is no immediate threat the crime represents a serious or ongoing threat to the campus community, an Alert will be issued, as described above. **The victim's name and other personally identifying information will NOT be included in any Emergency Notification or Crime Alert.**

The emergency notification system is provided in addition to existing emergency notification procedures and does not replace or eliminate any other emergency notification system (e.g., fire alarms, tornado sirens). The College will generally provide follow-up information to the community as appropriate via the college's website portal and/or text message.

Timely Warnings

In the event of a potentially dangerous situation involving the College community, either on or off campus, that, in the judgment of the Director of Compliance and Safety (in consultation with the College President and MCF Safety & Security or FMC Police) constitutes an ongoing or continuing threat, a campus-wide "timely warning" will be issued without delay. This Timely Warning will be issued through the Mount Carmel College of Nursing Communications Alert System to students and employees. Students and employees are automatically registered for the Alert System. The purpose of a Timely Warning is to enable persons to protect themselves, to heighten safety awareness and to seek information that will lead to an arrest and conviction of the perpetrator when violent crimes against persons or major crimes against property have occurred.

Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, the Mount Carmel College of Nursing Communications Alert System sends messages via text message and to MCCN email addresses. If deemed appropriate, an

announcement will also be made via in-class announcement, social media postings or the College website (mccn.edu). If announcements are made to other outlets, such information will be specified in the text message or email.

Anyone with information warranting a timely warning should report the circumstances to MCF Safety & Security at 614-234-4831 or the Fairfield Medical Center Police Department at 740-687-8019. Callers should identify themselves to the operator as a Mount Carmel College of Nursing student, faculty or staff member, if applicable.

The victim's name and other personally identifying information will NOT be included in any Emergency Notification or Timely Warning See additional information below.

Emergency Alert v. Timely Warning

Emergency Alert	Timely Warning
Under Clery, the institution is required to immediately notify the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.	Under Clery, the institution must alert the campus community to certain crimes in a manner that is timely and will aid in the prevention of similar crimes . Although Clery doesn't define "timely," because the intent of a warning regarding a criminal incident(s) is to enable people to protect themselves, this means that a warning should be issued as soon as the pertinent information is available .
<p>Examples (includes but are not limited to):</p> <ul style="list-style-type: none"> • Outbreak of meningitis, norovirus or other serious illness • Approaching tornado, hurricane or other extreme weather conditions • Earthquake • Gas leak • Terrorist incident • Armed intruder • Bomb threat • Civil unrest or rioting • Explosion • Nearby chemical or hazardous waste spill 	<p>You must issue a timely warning for any Clery Act crime that occurs on your Clery geography that is:</p> <ul style="list-style-type: none"> • Reported to campus security authorities or local police agencies; and • Is considered by the institution to represent a serious or continuing threat to students and employees. <p>Timely warnings are not limited to violent crimes or crimes. Timely warnings can be issued for threats/risks to persons or to property.</p>

Publicly Available Record-Keeping

The College does not publically publish or archive Timely Warnings or Emergency Notifications. However, incident reports may be open for inspection and copying. The College uses its best efforts to protect the identity of the victim and the intimate details of the report; however, the extent to which MCCN can protect the identity of a victim in police reports is not absolute. The College is specifically permitted to withhold the identity of an uncharged suspect.

Emergency Drills, Testing and Evacuation Procedures

Evacuation drills are coordinated by MCF Security at least annually and may be conducted in the form of a drill, tabletop, functional, or full scale exercise. These exercises may include not only College personnel, but also surrounding jurisdiction first responders and government agencies, as well as other Mount Carmel colleagues. MCF Security documents a description of each exercise as well as the date and time of the exercise and information about whether the test was announced or unannounced. The College works closely

with MCF Security to conduct exercise activities in accordance with Federal and State exercise guidelines. All campus wide exercises meet or exceed the minimum requirements set forth by the Homeland Security Exercise and Evaluation Program (HSEEP). HSEEP is the standard for which all drills and exercises should meet. HSEEP sets forth minimum requirements that include the assessment and evaluation of emergency plans, response capabilities, and evacuation procedures. HSEEP also requires follow-up to ensure proper follow-up and corrective action where necessary.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of an emergency. During the drill, building occupants 'practice' drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm. In addition to educating the occupants of each building about the evacuation procedures during the drills, the process also provides the College an opportunity to test the operation of fire alarm system components.

Testing of the MCCN Alert System occurs quarterly. MCF Security provides safety training to students through New Student Orientation programs.

The College's Director of Compliance and Safety sits on the Mount Carmel Franklinton Safety Team which reviews and develops all safety and emergency plans. The team meets annually to review safety plans throughout the Franklinton campus.

Evacuation Procedure (Code E-Vac):

When a Code Evac is called, it is necessary to remove College faculty, staff, students and visitors from the College buildings.

- Evacuate persons in immediate danger.
- The order to evacuate an area or the facility must come from the College President, Director of Compliance and Safety, or a representative from Safety and Security. The evacuation order will be announced overhead and/or via the College Alert System.
- Evacuation can be immediate, partial (from one area to another area) or total (removal of everyone from the building).
- If an evacuation of the building is necessary, all occupants will gather in the parking area (east) directly across from the main College entrance unless instructed otherwise

Building Security and Access

MCCN Main Campus

MCF Safety & Security provides services to Mount Carmel College of Nursing. MCCN is an independent institution and considered private property. Persons who do not have legitimate business on campus may be asked to leave or considered as trespassers.

The main entrance to the College is locked 24/7/365 and, as such, the College is not accessible to the public. Students and employees must use ID swipe access at the Marian Hall doors during all hours. All guests must be let in by Safety & Security staff upon their arrival. All students, employees, and guests must wear proper, College-provided, identification at all times while inside College buildings. During non-business hours, access to College facilities is by authorized key card or by admittance via MCF Safety & Security, Student Services staff, or College administrators. Cameras are located throughout the College with 24 hour recording.

MCF Safety & Security officers have the authority to issue parking citations but do not have arrest powers. MCF Safety & Security maintains a professional working relationship and refers criminal incidents to the Columbus

Police Department (CPD), which has jurisdiction on the campus. MCF Safety & Security issues a photo identification badge to each student and employee. MCF Safety & Security provides uniform security to MCCN 24 hours a day, seven days a week to assist college faculty, staff and students.

Mount Carmel Health System staff work in coordination regarding the maintenance of facilities, landscaping, and lighting on campus. MCF Safety & Security provides crime prevention audits to MCCN, reviewing lighting, landscaping and obstructions.

In addition, emergency call boxes are located outside of parking garages and at various locations throughout the Franklinton campus.

Lancaster Campus

Mount Carmel College of Nursing Lancaster is located within Fairfield Medical Center (FMC), which is a nonprofit community hospital. Persons who do not have legitimate business on campus may be asked to leave or considered as trespassers.

During business hours, FMC is open to students, parents, employees, hospital personnel, contractors, guests, visitors, and invitees. During non-business hours, access to hospital facilities is by authorized key card or by admittance via FMC Police. All hospital external doors are locked via a computer system at 11:00 p.m. through 5:30 a.m. except the Emergency Department entrance, which is known as the North Entrance. After entrance through the Emergency Department, there is a set of locked double doors before access to the Kroger Pharmacy.

FMC Police are fully commissioned officers by the governor of the state of Ohio. The officers have full arrest powers and are armed.

FMC Human Resources Department issues a photo identification badge to each student, employee, and independent contractor. Sales representatives and vendors are signed in through a software program, "Vendor Mate," which is located in the Materials Management Department.

FMC Police and Lancaster City Police patrol the campus and surrounding areas regularly. Security escorts are available to students upon request by calling 740-687-8019. FMC Police and the Plant Engineering Department work in coordination regarding the maintenance of facilities, landscaping, and lighting on campus.

Panic alarms are located throughout the interior of the facility. Emergency call boxes are located on each of the three levels of the parking garage and at the south entrance of the hospital. Recording cameras operate 24 hours a day, 7 days a week and are located throughout the campus.

Alcohol, Drug, and Substance Abuse Policies

The following information is provided in response to the Drug-Free Schools and Communities Act Amendments of 1989, which requires that the College show that it has adopted and implemented a program to prevent the use of illicit drugs and the abuse of alcohol by students and employees. The College must certify that it is in compliance with this law in order to receive any federal funds. The law requires, in part, the annual distribution of the following descriptive statements to each College student and employee. There is no distinction between full-time and part-time or permanent and temporary students and employees.

The unlawful possession, use, consumption or distribution of drugs and/or alcohol by students or employees on College property or as a part of any College activity is prohibited. Violators will be prosecuted in accordance with applicable laws and ordinances and will be subject as well to disciplinary actions by the College, in accordance with the MCCN *Catalog-Handbook*.

All students and employees entering MCCN are tested for illicit drug and substance use. This is a mandatory requirement for the College community. Sanctions for violations may include suspension, compulsory attendance at drug/alcohol education programs, termination/dismissal, or other appropriate disciplinary measures.

The College enforces federal and state drug laws. The possession, sale, manufacture or distribution of illegal drugs is prohibited under both state and federal laws, and thus is prohibited on campus or as any part of the College's activities. Such laws will be enforced by the College's law enforcement authority on campus. Violators of the College's policies or federal and state laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

Illicit drugs include substances such as opium derivatives, hallucinogens (e.g., marijuana, mescaline, peyote, LSD, psilocybin), cocaine, amphetamines, codeine, heroin, methamphetamines, morphine, and other drugs prohibited by law. Lawfully prescribed drugs being taken under a physician's directions are permitted. Abuse of prescribed drugs will be considered the same as abuse of illicit drugs.

According to the Ohio Revised Code (Section 2925.11), any individuals who knowingly make, obtain, possess, use, or sell controlled substances are subject to legal penalties. In addition, as a result of the AntiDrug Abuse Act of 1988, a court of law may suspend or terminate an individual's eligibility for federal benefits, including student financial assistance, if that individual is convicted of certain drug offenses.

Legal and Responsible Use of Alcohol

The possession or use of alcohol by anyone under 21 years of age is illegal, and individuals in violation will be subject to disciplinary action by MCCN. Alcoholic beverages are never served to students during any campus events. Individuals who bring or use alcoholic beverages into the College are subject to disciplinary action including possible expulsion from the College.

Drug Use

The use, offer for sale, sale, distribution, possession, or manufacture of any controlled substance or drug except as expressly permitted by law is prohibited. The use, offer for sale, sale, distribution, possession, or manufacture of chemicals, products, or materials for the purpose of use as an intoxicant (such as glue or paint) except as expressly permitted by law is also prohibited. Possession of drug paraphernalia is also prohibited. Individuals who bring or use illegal drugs into the College are subject to disciplinary action including possible

expulsion from the College. More information can be found in the drug abuse policies published in the *Student Handbook-Catalog*.

Federal Drug Laws

Denial of Federal Benefits (21 U.S.C. 862) A federal drug conviction may result in the loss of federal benefits, including school loans, grants, scholarships, contracts, and licenses. Federal drug trafficking convictions may result in denial of federal benefits for up to five years for a first conviction. Federal drug convictions for possession may result in denial of federal benefits for up to one year for a first conviction and up to five years for subsequent convictions.

Forfeiture of Personal Property and Real Estate (21 U.S.C. 853) Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation, including houses, cars, and other personal belongings. A warrant of seizure is issued and property is seized at the time an individual is arrested on charges that may result in forfeiture.

Federal Drug Trafficking Penalties (21 U.S.C. 841) Penalties for federal drug trafficking convictions vary according to the quantity of the controlled substance involved in the transaction. Penalties for subsequent convictions are twice as severe. If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million. Persons convicted on federal charges of drug trafficking within 1,000 feet of a university (21 U.S.C. 860) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year.

Federal Drug Possession Penalties (21 U.S.C. 844) Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison and a mandatory fine of no less than \$1,000. Second convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

Drug and Alcohol State Law Summary

Possession of Marijuana: The use and possession of recreational marijuana is illegal. OHIO REV. CODE § 2925.11(A). Violators are guilty of a minor misdemeanor if the amount is less than 100 grams, resulting in a \$150 fine. OHIO REV. CODE § 2925.11(C)(3). Increased amounts lead to increased penalties. *Id.* Medical marijuana use is permitted under certain conditions. OHIO REV. CODE §§ 3796.01-3796.30

Controlled Substances: Ohio has a wide range of laws governing controlled substances and their possession and distribution. OHIO REV. CODE §§ 2925.01-2925.58. Penalties vary widely based on the amount and type of substance used. Under Ohio law, no person shall knowingly obtain, possess, or use a controlled substance. OHIO REV. CODE § 2925.11. Possession of certain drugs, like cocaine, LSD, and heroin, results in a charge of aggravated possession of drugs, a fifth-degree felony. *Id.* Possession of larger amounts of drugs leads to a presumption of prison time.

Selling or offering to sell a controlled substance is illegal. OHIO REV. CODE § 2925.03. Doing so results in an aggravated felony (unless the substance is marijuana), subject to prison time and fines. OHIO REV. CODE §§ 2925.11, 2929.12. As an example, if a person is found guilty of possession of 12 grams of opium, he is guilty of a third-degree felony, facing 9–36 months in prison and a possible \$10,000 fine.

Alcohol and Minors: No person under the age of 21 shall purchase beer or intoxicating liquor. OHIO REV. CODE § 4301.63. Doing so can result in a fine between \$25–\$100. OHIO REV. CODE § 4301.99. Use of fake identification is also prohibited. OHIO REV. CODE § 4301.634 (West 2020). Doing so is a misdemeanor of the first degree. OHIO REV. CODE § 4301.99. It is illegal to sell beer or intoxicating liquor to a minor. OHIO REV. CODE § 4301.22. This is also a misdemeanor and can result in a fine between \$500–\$1000 and imprisonment up to 60 days. OHIO REV. CODE § 4301.99.

Driving Under the Influence (DUI): No person shall operate a vehicle under the influence of alcohol. OHIO REV. CODE § 4511.19. The legal limit is 0.08 percent. Operating under the influence results in a mandatory prison term of 3 days (possibly more) as well as the possibility of an intervention program. OHIO REV. CODE § 4511.19(G)(1)(a)(i).

Alcohol and Other Drug Education

MCCN encourages education to assist students to understand the consequences of current and future behavior as it relates to drug and alcohol use.

If a student tests positive for non-prescribed controlled or illegal substances and/or alcohol, the student may immediately be referred to a Mount Carmel Health System Assistance Program (or Virtual Care Group) for assessment and possible referral to a trained substance abuse counselor.

Counseling, Treatment and Rehabilitation Services

Mount Carmel College of Nursing demonstrates its commitment to eliminating illegal drug use and resolving alcohol problems by offering students and employees the opportunity to participate in Mount Carmel's programs. A partial list of services provided includes alcohol and drug abuse, anxiety and depression, family relationships, job and legal concerns, marital and other relationship difficulties, and self-esteem issues.

The Virtual Care Group partnership also provides counseling and rehabilitation for all referrals. Participants with drug or alcohol abuse problems may be referred to additional appropriate services. Those needing assistance may visit www.thevirtualcaregroup.com/mccn. A licensed professional is available to assist 24-hours a day.

Title IX Policies; Dating Violence and Sexual Assault

Mount Carmel College of Nursing is committed to maintaining a safe, secure, living, learning and working environment. This includes providing an environment free from sexual discrimination, domestic violence, dating violence and stalking. All members of the College community are expected to conduct themselves in a manner that does not infringe upon the rights of others. MCCN believes in a zero tolerance policy for any type of criminal activity.

Sexual Offense Prevention and Response

The College's Title IX Policy prohibits "Sexual and Interpersonal Offenses" such as sexual assault, sexual misconduct, sexual violence, domestic violence, dating violence, and stalking. "Sexual offenses" include any sexual act directed toward another person, without consent of the victim, including instances where the victim is incapable of giving consent. Under the Clery Act, sexual assault includes rape, fondling, incest, and statutory rape. Sexual conduct requires consent.

The following are definitions of the sexual interpersonal offenses per the Clery Act requirements:

Definitions

These definitions are sourced, as required by the Clery Act, from the FBI Summary Reporting System Use Manual, the National Incident-Based Reporting System User Manual, and/or Violence Against Women Act of 1994.

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 offense includes the rape of males, females, and all individuals, regardless of gender.

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 unable to give consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.

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

Statutory rape: Sexual intercourse with a person who is under the statutory age of consent.

Consent: The College defines consent as an act that must be voluntary. An individual cannot consent who is substantially impaired by any drug or intoxicant; or who has been compelled by force, threat of force, or deception; or if the accused substantially impairs the victim/survivor's judgment or control by administering any drug, intoxicant or controlled substance to the other person surreptitiously or by force, threat of force or deception; or who is unaware that the act is being committed; or whose ability to consent is impaired because of a mental or physical condition; or who is coerced by supervisory or disciplinary authority. Consent may be withdrawn at any time. Prior sexual activity or relationship does not, in and of itself, constitute consent.

Domestic violence: A felony or misdemeanor crime of violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabiting with or has cohabited with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred;

- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: fear for the person's safety or safety of others; or suffer substantial emotional distress.

For the purpose of this definition: Course of conduct means two or more acts, including but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. "Reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim.

Dating violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.

For purposes of this definition: dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse; dating violence does not include acts covered under the definition of domestic violence.

Ohio Law Definitions

Ohio law definitions of the above offenses differ in some respects from the Clery Act definitions. In addition, not all Clery Act offenses have the same name as offenses defined by Ohio's criminal code. Ohio definitions of the corresponding offenses are as follows:

R.C. 2907.02 Rape:

- (A)(1) No person shall engage in sexual conduct with another who is not the spouse of the offender or who is the spouse of the offender but is living separate and apart from the offender, when any of the following applies:
 - (a) For the purpose of preventing resistance, the offender substantially impairs the other person's judgment or control by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception.
 - (b) The other person is less than thirteen years of age, whether or not the offender knows the age of the other person.
 - (c) The other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age.
- (2) No person shall engage in sexual conduct with another when the offender purposely compels the other person to submit by force or threat of force.

R.C. 2907.03 Sexual battery:

- (A) No person shall engage in sexual conduct with another, not the spouse of the offender, when any of the following apply:
 - (1) The offender knowingly coerces the other person to submit by any means that would prevent resistance by a person of ordinary resolution.

- (2) The offender knows that the other person's ability to appraise the nature of or control the other person's own conduct is substantially impaired.
- (3) The offender knows that the other person submits because the other person is unaware that the act is being committed.
- (4) The offender knows that the other person submits because the other person mistakenly identifies the offender as the other person's spouse.
- (5) The offender is the other person's natural or adoptive parent, or a stepparent, or guardian, custodian, or person in loco parentis of the other person.
- (6) The other person is in custody of law or a patient in a hospital or other institution, and the offender has supervisory or disciplinary authority over the other person.
- (7) The offender is a teacher, administrator, coach, or other person in authority employed by or serving in a school for which the state board of education prescribes minimum standards pursuant to division (D) of section 3301.07 of the Revised Code, the other person is enrolled in or attends that school, and the offender is not enrolled in and does not attend that school.
- (8) The other person is a minor, the offender is a teacher, administrator, coach, or other person in authority employed by or serving in an institution of higher education, and the other person is enrolled in or attends that institution.
- (9) The other person is a minor, and the offender is the other person's athletic or other type of coach, is the other person's instructor, is the leader of a scouting troop of which the other person is a member, or is a person with temporary or occasional disciplinary control over the other person.
- (10) The offender is a mental health professional, the other person is a mental health client or patient of the offender, and the offender induces the other person to submit by falsely representing to the other person that the sexual conduct is necessary for mental health treatment purposes.
- (11) The other person is confined in a detention facility, and the offender is an employee of that detention facility.
- (12) The other person is a minor, the offender is a cleric, and the other person is a member of, or attends, the church or congregation served by the cleric.
- (13) The other person is a minor, the offender is a peace officer, and the offender is more than two years older than the other person.

R.C. 2919.25 Domestic violence.

- (A) No person shall knowingly cause or attempt to cause physical harm to a family or household member.
- (B) No person shall recklessly cause serious physical harm to a family or household member.
- (C) No person, by threat of force, shall knowingly cause a family or household member to believe that the offender will cause imminent physical harm to the family or household member.

R.C. 2903.211 Menacing by stalking.

- (A)(1) No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person. In addition to any other basis for the other person's belief that the offender will cause physical harm to the other person or the other person's family or household member or mental distress to the other person or the other person's family or household member, the other person's belief or mental distress may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs.

- (2) No person, through the use of any form of written communication or any electronic method of remotely transferring information, including, but not limited to, any computer, computer network, computer program, r-computer system, or telecommunication device shall post a message or use any intentionally written or verbal graphic gesture with purpose to do either of the following:
- (a) Violate division (A)(1) of this section:
 - (b) Urge or incite another to commit a violation of division (A)(1) of this section.
- (3) No person, with a sexual motivation, shall violate division (A)(1) or (2) of this section

Reporting Incidents

- **Online:**
 - Go to www.mccn.edu/about/titleix
 - Click on the “Report an Incident” link
 - Follow instructions on reporting form
- **Phone:**
 - Title IX Coordinator: 614-234-2341
 - MCCN Security: 614-896-1489
- **E-Mail:**
 - compliance@mccn.edu
 - mjoseph-kemplin@mccn.edu
- **Confidential Reporting Options:**
 - Mount Carmel Crime and Trauma Assistance Program: 614-234-5900
 - Sexual Assault Response Network *24-Hour Rape Helpline*: 614-267-7020
 - CHOICES for Victims of Domestic Violence *24-Hour Crisis Hotline*: 614-224-4663

Ohio law and MCCN policy require those not in a legally protected role with knowledge of a felony to report it to law enforcement. MCCN personnel, are required to report Sexual and Interpersonal Offenses to the MCF Safety & Security who will, in turn, report it to the Director of Compliance and Safety. Reporting to MCF Safety & Security, FMC Police or other law enforcement does not require the victim/survivor to pursue criminal charges.

Actual Knowledge and Notice of Incident: A student making a report to Administrative Staff Leadership, as defined on the MCCN website at www.mccn.edu/about/leadership (with exception of the Board of Trustees) constitutes actual knowledge of an alleged violation of this policy. Individuals listed on that website have been instructed to immediately inform the Title IX Coordinator/Director of Safety and Compliance of any such reports made.

All faculty and staff members are considered “Responsible Employees”, and have an obligation set by MCCN to report incidents to the Director of Compliance and Safety. However, reports made to faculty and staff other than those listed above do not qualify as MCCN actual notice as those staff members may not be in a position to institute corrective measures on MCCN's behalf. Students should also not consider those individuals to be confidential resources.

Amnesty for Minor Policy Violations: The MCCN community encourages the reporting of misconduct and crimes by reporting parties and witnesses. Sometimes, reporting parties or witnesses are hesitant to report to MCCN officials or participate in resolution processes because they fear that they themselves may be accused of policy violations, such as underage drinking at the time of the incident. It is in the best interests of this community that reporting parties choose to report, and that witnesses come forward to share what they know.

To encourage reporting, MCCN allows reporting parties and witnesses amnesty from minor policy violations related to the incident. The use of alcohol or other drugs does not justify sexual misconduct, and a person who was incapacitated due to the use of alcohol or other drugs cannot consent to sexual activity.

Next Steps: Once the Director of Compliance and Safety receives a report of a potential policy violation, the Director will conduct a preliminary assessment of the report. The Director of Compliance and Safety or their designee will conduct an investigation to bring together all facts, conduct interviews with the involved parties, and will include any relevant evidence for the case.

Upon completion of the investigation, and the accused is another MCCN student, the complaint may be referred to the Student Conduct Process below. If the accused is someone other than a student (e.g., a MCCN employee, vendor, contractor or subcontractor), the Director of Compliance and Safety will inform the complainant of the right to pursue a complaint using the appropriate process and refer and guide the complainant to the appropriate process. If the responding party is a student at another college, the Director of Compliance and Safety will assist the student in reporting the conduct to their home school.

Supportive Measures & Interim Actions

MCCN provides a number of interim and other support services, upon request, to students who have been involved in any of the above listed conduct, including those alleged to have violated policies. Students may, upon request, obtain interim support services, such as changing academic, residential, working, and transportation circumstances from the Director of Compliance and Safety. Supportive measures may be enacted for an interim period or, after a resolution, more final/permanent. These services include the following:

- Changing class assignments so that the parties do not share the same classes;
- Providing academic support services including tutoring;
- Changing the students' work situation;
- Transportation/parking options;
- Prohibiting any contact between the parties; and/or
- Assisting in obtaining a MCCN no-contact directive.

If the responding party is a MCCN student, students may file a disciplinary complaint of a policy violation with the Director of Compliance and Safety. Criminal investigations and/or prosecutions do not determine whether a violation of this Policy has occurred. Disciplinary action generally cannot begin without disclosing the victim/survivor's identity. MCCN reserves the right to pursue disciplinary action if MCCN believes there is sufficient information to proceed without the participation of the involved party. This process is followed for all members of the MCCN community.

Community members can file a disciplinary complaint without pursuing criminal charges. The purpose of these disciplinary proceedings is to provide a prompt, fair and impartial investigation and resolution of the complaint(s). Disciplinary complaints may be filed at any time the accused is a student at MCCN.

Programming, Education and Resources

All students and employees are provided with online training and various in person training offerings. Students and employees are educated on domestic abuse as well as on risk reduction and security services offered through MCCN and in the community. Also during orientation, in online training, and various in person training offerings, students and employees are informed about bystander intervention and provided information on safe and positive options for bystander intervention. The College informs its employees about bystander intervention and domestic abuse during faculty/staff training. The College holds periodic programs to enhance

awareness regarding rape, acquaintance rape, and other sexual offenses. Literature on sexual assault, date rape education, and risk reduction is available through Student Affairs staff and throughout the College.

The list of training programs conducted in 2022 includes, but is not limited to the following events:

- SafeZone Trainings
- Welcome Day/Orientation Events
- Title IX Compliance Education Training and Presentations
- Sexual Assault Awareness speakers
- MCCN Wellness Festival
- Individual In-Class Presentations

Supportive Services

The College is able to provide supportive services to victims of sexual assault through the Hospital's Mount Carmel Crime and Trauma Assistance Program (614-234-5900). This program provides support and assistance for victims of assault, including counseling for such individuals. In addition, the Sexual Assault Response Network of Central Ohio (SARNCO) maintains a 24-hour advocacy through their rape crisis helpline at 614-267-7020. The SARNCO website is located at www.ohiohealth.com/sexualassaultresponesenetwork/.

Sex Offender Registration

The Campus Sex Crimes Prevention Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed by, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Act. The federal law requires state law enforcement agencies to provide MCCN with a list of registered sex offenders who have indicated they are either enrolled in, or employed by, MCCN.

The Franklin County Sheriff's Office and the Fairfield County Sheriff's Office each have responsibility for registration of sex offenders under Ohio's Sex Offender Registration and Notification (SORN) laws. MCCN will make available to the College community information on any sexual offender who enrolls in, or is employed by, the College. The information is made available to MCCN by the respective sheriff's office and maintained in the College Compliance and Safety office, located on the fourth floor of the Medical Staff Building. In addition, information concerning registered sex offenders may be obtained from the Franklin County Sheriff's Office online at <https://sheriff.franklincountyohio.gov/> or the Fairfield County Sheriff's Department at <https://www.sheriff.fairfield.oh.us/>.

The CSCPA amends the Family Educational Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the Act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

Student Conduct Process

The Process outlined below is representative of the process for the ASR Reporting Year 2023. The conduct resolution process currently in place and approved by College Faculty Senate in August of 2023 can be found at <https://catalog.mccn.edu/content.php?catoid=29&navoid=4592#resolving-allegations>

Informal Resolutions

Some incidents are most appropriately resolved informally. Possible informal resolutions include referrals to a variety of educational workshops, counseling referrals, and/or other outcomes as agreed upon by all parties. Students may also participate in resolution or restorative justice conferences as methods of informal resolution, which may eliminate the need for more formal proceedings. At any time, either party can withdraw from the informal resolution process and resume the formal resolution process. Informal resolution is voluntary and must be agreed to by all parties. All alleged violations under this policy are subject to informal resolution. If the matter is not resolved informally, or the student allegedly violates academic integrity standards a second time, the case will move to a formal resolution method. Outcomes of informal resolutions cannot be appealed.

The student and staff (Director of Compliance and Safety or designee) or faculty member may engage with one another. Both parties can discuss the situation, decide on an appropriate outcome to move forward with. The faculty and staff member may consult with other academic department or administrative office leaders and the appropriate senior-level leadership in handling of the situation. If both the student and faculty or staff member feel as if the issue is resolved, faculty or staff member will inform the Director of Compliance and Safety. All informal resolutions are documented. This will be noted in the case file for the incident, but not be reflected in the student's permanent record. A meeting summary letter will be sent to the student with the agreed upon resolution.

Formal Resolutions

Conduct Administrative Hearing: The alleged student(s) is given the opportunity to attend a scheduled meeting with a Conduct Hearing Officer (Director of Compliance and Safety or designee) to discuss the policy violations that have been brought against them. The Conduct Hearing Officer will determine an outcome of the policy violations following the meeting. An outcome may not be immediately determined in the meeting in situations where there are multiple respondents involved in a complaint, or if additional information is needed for an informed decision. The Conduct Hearing Officer will notify the alleged student of the outcome in a follow-up email communication.

Failure to attend a scheduled meeting may result in a determination being made without the input of the alleged student. Alleged students that do not attend the meeting will not be permitted to appeal the decision unless the severity of the sanction is not consistent with the violation. It should be noted that if a student's file has a record of similar violations then a sanction may be issued based on the totality of the student's history and circumstances presented.

Academic and Professional Conduct Hearing Panel: Formal resolution of the most egregious and serious complaints involves adjudication of the complaint through a Conduct Hearing Panel. A Conduct Hearing Panel is typically reserved for cases where a student may be removed from the College or for students found in repeated violations. A Conduct Hearing Panel is comprised of no less than three voting members. The voting members are either faculty or staff and have received student conduct adjudication training as well as education about trauma-informed response to sexual misconduct. The Director of Compliance and Safety, or designee, will manage hearing logistics and chair hearings, but is not an active participant in the hearing, is not a voting

member of the panel, and does not participate in deciding upon or issuing sanctions. The Director will provide the panel with relevant sanction guidelines and/or applicable conduct history only if there is a finding of responsibility.

A complainant and/or respondent may challenge the participation of a Conduct Hearing Panel member based on the member's perceived or actual conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the Director of Compliance and Safety at least 48 hours prior to the commencement of the hearing. At their discretion, the Director will determine whether a panel member should be replaced or not. A panelist will be replaced if they recuses themselves or when it is determined that their conflict of interest, bias or prejudice precludes an impartial hearing of the allegation. It should be noted that in these cases, the hearing may be delayed in order to name an appropriate replacement for any removed panel member.

Electronic devices (e.g., computer, cell phone, audio/video recorder, etc.) are not permitted in the hearing room. The panel will make an audio recording of the hearing to be kept on file in a secure location, such as a secure database management system for at least seven years. Reasonable care will be taken to create a quality audio recording and minimize technical problems. Technical problems that result in no recording or a poor-quality recording will not be a valid basis for appeal. All parties may request review of the recording by contacting the Director of Compliance and Safety.

The Panel will hear information from all witnesses interviewed during the investigation. Witnesses who were not part of the investigation are not permitted to participate in the hearing. When adjudicating a case, the Panel may make reasonable assumptions based on the witness' participation or lack thereof. Witnesses are subject to cross examination by either party's advisor.

All questions must be related to policy elements of the violations being charged or related to content/clarification of the case materials. Parties are permitted to cross examine one another. However, in Title IX related hearings, the parties may not question each other or other witnesses directly but may do so through their support advisor at the appropriate time in the hearing. The Conduct Hearing Chair determines the relevancy of the questions and may, in their sole discretion, deny a request for a question. If a request is denied, the reason for the denial will be provided to the requesting party.

Related to Title IX hearings, questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

The parties will all be in the same room together. However, at either party's request, an electronic hearing may take place through phone or video conferencing.

Interim Suspensions

An accused student may be suspended from campus on a temporary, interim basis, based on a threat to the campus. An individualized threat assessment will be conducted to determine individual risk to the community. An interim suspension may prohibit the student from all or part of MCCN property and activities or permit the student to remain only under specified conditions (e.g., no-contact directive). Any student placed on interim suspension may immediately appeal the suspension to the Associate Dean for Student Services, or designee, following the directions found in the official suspension letter.

Possible Sanctions

The following outcomes can be assigned during an informal resolution or if there is a responsible finding during a formal conduct hearing (administrative or panel).

Warning: defined as a notification that a student has committed certain violations and that continuance of such conduct will result in more severe disciplinary action.

Educational Sanctions: These include but are not limited to alcohol education, counseling assessment and adherence to professional counseling recommendations, research paper or project, hall or building program with a residential life staff member, group education program, etc. A Performance Improvement Contract (PIC) may be initiated as part of an educational sanction through the Formal Resolution process.

Disciplinary Probation: defined as the student is not in good disciplinary standing with the College (for a specified period of time, ordinarily no less than one term/semester), and any future violations may result in an additional immediate referral to the Academic and Professional Misconduct Committee hearing process, with a recommendation of a more severe disciplinary action.

Disciplinary Suspension: defined as the denial of the opportunity to continue in the College for a specified period of time (ordinarily no less than one term/semester). While suspended, a student is not allowed to be on campus or to attend any official College event. In the event that additional educational sanctions are imposed in conjunction with the suspension, these sanctions will most likely be expected to be completed prior to an application for reinstatement to be considered before the Academic Progress Committee. A student wishing to return after a period of suspension must apply for reinstatement and is not guaranteed reinstatement.

Disciplinary Dismissal: defined as the denial of the opportunity to continue as a student at the College. A student who is disciplinarily dismissed is not allowed to be on campus or to be at any official College event at any time, unless given prior written approval. A student who is disciplinarily dismissed will not be afforded the opportunity for reinstatement or readmission to the College at any time.

Disclosure of Disciplinary Actions

To Victim of an Alleged Sex-Based Offense

Both the reporting party and the respondent will be simultaneously informed, in writing, of the outcome of any institutional proceeding that arises from an allegation of domestic violence, dating violence, sexual misconduct or stalking. The reporting party and the respondent will also be informed of the procedures to appeal the results of the disciplinary proceeding; of any changes to the results that occur prior to the time that such results become final; and when such results become final.

To Victims of an Alleged Perpetrator of a Crime of Violence

Upon written request, MCCN will disclose to the alleged victim of any crime of violence or sexual misconduct, the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of the crime or offense, the information shall be provided, upon request, to the next of kin of the alleged victim.



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