Jeanne Clery Disclosure of Campus Security Policy & Campus Crime Statistics Act

PURPOSE

To address Pinnacle Career Institute's (PCI) obligations pursuant to the "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act," 20 U.S.C. § 1092(f) (the "Clery Act")

I. SCOPE

This policy applies to all members of the PCI community and the public.

II. POLICY

Pinnacle Career Institute (PCI) is committed to providing a safe and crime free environment for all students, faculty and staff by performing a regular evaluation of its security programs and monitoring and following up on each crime reported at a PCI location (campus).

Pinnacle Career Institute (PCI) shall comply with its obligations under the Jean Clery Disclosure of Campus Security Policy and Crime Statistics Act, and the Higher Education Opportunity Act of 2008 to report all Clery Act Crimes, to disclose crime statistics, to provide campus safety and security policy statements, and to notify the campus community regarding Clery Act Crimes and other serious incidents. Pinnacle Career Institute shall establish an Administrative Clery Committee to meet annually to review each campus' Clery Act compliance efforts. The President will appoint the organization's Clery Compliance Officer. The Clery Compliance Officer shall work with the Administrative Clery Committee to develop and implement policies and procedures regarding the campus's Clery Act obligations.

Definitions

- **Administrative Clery Committee:** A committee comprised of the following campus officials who meet to review PCI's Clery Act compliance efforts and make recommendations to the Clery Compliance Officer regarding PCI's Clery Act obligations: The President or his/her designee; Executive Vice President, the Human Resource Generalist, the Senior Compliance Officer, and the System Registrar/Title IX Compliance Officer.
- **Campus Security Authority ("CSA"):** Groups of individuals and organizations specified in the Clery Act and associated with the campus, including:
  - PCI is a non-residential school, and does not have an on-campus police force. Therefore, all crimes should be reported to local law enforcement.
  - Individual(s) who have responsibility for campus security, but who are not affiliated with local law enforcement (i.e. security guards that work for the property);
  - Any individual or organization specified in the campus safety and security policy statements as an individual or organization to which students and employee should report criminal offenses; and
  - Any official of the campus who has significant responsibility for student and campus activities, including, but not limited to, student discipline and campus judicial proceedings, and who has the authority and the duty to take action or respond to a particular issue on behalf of PCI and the campus.
- **Security Compliance Officer:** The official appointed by the President to coordinate the Clery Act compliance program for PCI.

  - **Dating Violence** - Violence committed by a person (A) who is or has been in a social relationship of a romantic or Intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (I) The length of the relationship, (ii) The type of relationship, (iii) The frequency of interaction between the

Persons involved in the relationship.

- **Stalking** - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

- **Clery Act Crimes:** Certain crimes specified in the Clery Act on which each campus of PCI must compile statistics of reports made to the DPS, CSAs and local law enforcement, including, but not limited to:
  - **Murder -** The willful (non-negligent) killing of one human being by another.
  - **Negligent Manslaughter -** The killing of another person through gross negligence.
  - **Forcible Sex Offenses -** Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent.
    Forcible sex offenses include:
    - **Rape -** 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 consent of the victim.
    - **Fondling -** The touching of the private body parts of another person for the purpose of sexual gratification, with 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 incapacity.
  - **Non-forcible Sex Offenses** – Any sexual act direct against another person without consent of the victim, including instances where the victim is incapable of giving consent.
  - Other sex offenses include:
    - **Incest-**Sexual intercourse between persons who are related to each other with in the degrees where marriage is prohibited by law.
    - **Statutory Rape -** Sexual intercourse with a person who is under the statutory age of consent.
  - **Robbery -** The taking, or attempting to take, anything of value under confrontational circumstances from the control, custody, or care of another person by force or threat of force or violence, and/or by putting the victim in fear.
  - **Aggravated Assault -** An unlawful attack by one person upon another where either the offender displays a weapon, or the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
  - **Burglary -** The unlawful entry into a building or other structure with the intent to commit a felony or a theft.
  - **Motor Vehicle Theft -** The theft or attempted theft of a motor vehicle.
  - **Arson** - To unlawfully and intentionally damage, or attempt to damage, any real or personal property by fire or incendiary device.
  - **Liquor Law Violations** - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of intoxicating alcoholic beverages.
  - **Drug Related Violations (Sale and Possession)** - The unlawful cultivation, manufacture, distribution, sale, purchase, possession, transportation, or importation of any controlled drug or narcotic substance; or, the unlawful manufacture, sale, purchase, possession, or transportation of equipment or devices used for preparing and/or taking drugs or narcotics (drug paraphernalia).
  - **Weapon Law Violations** - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.
  - **Domestic Violence** - Includes felony or misdemeanor crimes 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 cohabitating with or has cohabitated 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 receiving grant monies, or 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. (See "Sexual Assault and Misconduct" section above for domestic violence definition in this jurisdiction.)

- **Annual Security Report:** A required annual report setting forth statistics for Clery Act Crimes and disciplinary referrals for drug, alcohol, and weapon offenses by type, location and year; campus security and policy statements; procedures for issuing to the campus community Timely Warnings of potentially dangerous criminal and emergency situations; campus evacuation procedures; and locations for obtaining information concerning registered sex offenders from state law enforcement agencies.
- **Clery Geography Map:** A map depicting the Core Campus and surrounding area that identifies on-campus property, non-campus property and public property.
- **Core Campus:** The same reasonably contiguous area of buildings or property owned or controlled by PCI that the campus and its students consider to be, and treat as, an integral part of the main campus; that are directly supported, or related to PCI's educational purposes; and that are covered by the same security and safety policies.
- **Crime Alerts/Emergency Notification:** Alerts that are published when a crime occurs on or near a campus that potentially threatens the campus community and which are reported to campus officials or to local law enforcement. The manner of dissemination to alert the campus community may include one or more of the following methods: email, voice mail and text messaging. In addition, the CSA or other campus official will post relevant warnings, updates and advisories on the appropriate campus bulletin board or social media web page.
- **On-Campus Property:** (1) Any building or property on the Core Campus; and (2) any building or property on the Core Campus that is owned by the campus, but is controlled by another person, is frequently used by students, and supports campuspurposes.
- **Public Property:** All public property, including thoroughfares, streets, sidewalks and parking facilities, that is within the Core Campus or immediately adjacent to and accessible from the Core Campus.
- **Timely Warning:** An announcement called a "Crime Alert" to inform the campus community of Clery Act Crimes and other serious incidents when a reported crime may pose a serious or continuing threat to the campus and surrounding community.

III. THE ANNUAL SAFETY & SECURITY REPORT (ASR)

Each year PCI publishes a report containing crime statistics from the previous year that were reported to local police agencies or to campus security authorities (CSAs) that occurred at the following locations:

- On campus
- In certain off-campus buildings, owned, or controlled by PCI
- Public property within or immediately adjacent to and accessible from the campus.

The statistics in the report reflect the number of criminal incidents reported to the various authorities. The report also includes institutional policies concerning alcohol and drug use, crime prevention, the reporting of crimes, sexual assault and other matters.

PCI's Annual Safety and Security Report (ASR) are attached. If, as you are reading the attached report, you find that you have any comments, questions or concerns, please address them to: Pinnacle Career Institute, ATTN: Security Compliance Officer, 10301 Hickman Mills Drive, Kansas City, MO 64137.

Preparing the Annual Disclosure

PCH has designated the Security Compliance Officer as the responsible party for compiling all data used to prepare the annual campus crime statistics report. Campus crime data is gathered the same day it is reported. The data is obtained annually from reports made to local law enforcement and compared to the data collected by the school. Crimes are counted in the disclosure based upon the crime having been reported, not whether there was a conviction resulting from the crime. The resulting data is used to prepare the annual crime statistics report.

The ASR is published and distributed annually by October 1 of each year to current students and employees. A notice of the ASR's availability is also provided to prospective students and employees, with a notice that a paper copy is available upon request. An electronic copy is available on PCI's website: https:///www.pcitraining.edu.

IV. PROCESSES, PROCEDURES AND GUIDELINES

Responsibilities

A. General Responsibilities

1. All faculty, staff and students must promptly and accurately report all suspected Clery Act Crimes and significant emergencies or dangerous situations occurring on On-Campus Property, Non-Campus Property and Public Property to a member of the CSA at their campus
2. All visitors must promptly and accurately report all suspected Clery Act Crimes and significant emergencies or dangerous situations occurring on On-Campus Property, Non-Campus Property and Public Property to a member of the CSA at the applicable campus.

3. All campuses must maintain for seven (7) years all Clery Act-related documentation in accordance with the State Records Commission approved

B. Security Compliance Officer's Responsibilities:

1. Responsible for gathering the data used to prepare the annual crime statistics report.
2. Must attend mandatory training.
3. Provide training for other members of the Campus Security Authority.

C. Campus Security Authorities (CSA's) Responsibilities:

1. All members appointed must attend mandatory training
2. All members of CSA must report must report suspected Clery Act Crimes that are brought to their attentions or that they personally witness, regardless whether the victim or alleged suspect are associated with PCI.
3. All members of CSA must ensure that a completed PCI Accident/Incident Report Form is completed as soon as possible and then either follow up on the report personally, or assign responsibility to another appropriate administrator to investigate.
4. All members of CSA must take any and all preventative measures or actions to ensure the safety and security of all staff, faculty and students.

D. Executive Director of Human Resources Responsibilities:

1. Must provide all prospective employees with a copy of the Annual Security Report
2. Must ensure that all newly hired employees are informed of the policies and procedures for reporting a Clery Crime
3. Must provide refresher information and annual awareness training on the Clery Act Compliance measures annually.
4. Must provide the Security Compliance Officer with any liquor, drug or weapon violations resulting in discipline for employees on an annual basis.

E. Admissions Office Responsibilities:

1. Must provide all prospective students with a copy of the Annual Security Report
2. Must ensure that all newly enrolled students have a copy of the policy and understand the process for filing a report.

2. Reporting Crimes on Campus

Members of the PCI community are cautioned to never attempt to apprehend or pursue a suspected criminal. Crimes or suspected criminals should be reported to a member of the CSA or other designated staff member at the applicable campus, or, if appropriate, contact local law enforcement by dialing 9-1-1. Immediately report any crime or incident of suspicious activity by calling the reporting line for the applicable campus or visiting the Student Services Office.

PCI-Main Campus	816-331-5700
PCI-North Kanas City - Satellite Location	816-331-5700

If there are any doubts about whether to report an incident that has occurred, report it. Victims of, or witnesses to crimes may disclose them on a voluntary, confidential basis with a member of CSA, which can assist them in determining whether the event constitutes a crime that has to be collected and statistically reported. The cooperation of all community members to report in a timely manner assists PCI in issuing equally timely warnings to the campus community.

All members of the campus community should be aware of their surroundings at all times. All should use their eyes, ears and telephone to keep campus officials advised of what is seen and heard campus-wide. The campus should be notified if any of the following are observed:

- Strangers loitering in office areas, hallways, classrooms or lounge areas
- Unsecured doors or windows in campus buildings when they should be locked
- Any person tampering with a motor vehicle or loitering in the parking lot(s)
- Any person publicly displaying weapon
- Any person loitering in a dark, secluded area
- Any suspicious person carrying articles, equipment, luggage or other questionable packages out of campus buildings.

3. **Safety Tips**

Crime is a serious problem with no quick or easy solution. All members of the PCI community are encouraged to assist one another by taking responsibility for personal safety and assisting with the security needs of others. While PCI staff and security measures offer assistance with regards to safety concerns, ultimately, the primary responsibility for personal safety lies with the individual.

Below are some things that all members of the PCI community need to remember:

- Be aware of your surroundings at all times, no matter where you are
- If you feel uncomfortable in a place, leave right away
- Keep your eyes and ears open and your hand free
- Choose busy streets and avoid going through dark, deserted areas
- At night, walk in well-lit areas whenever possible.
- Never walk or jog alone. Always take a buddy
- Avoid carrying large sums of cash
- When in public spaces, keep valuable items including jewelry, mobile phones and wallets out of sight.
- Carry a pepper or mace spray as a precautionary measure.
- Walk in groups, to and from buildings, when leaving or entering buildings after dark
- Communicate any suspicious behavior immediately.

V. SECURITY, PERSONAL SAFETY & CRIME PREVENTION

Pinnacle Career Institute provides information on personal safety and crime prevention. The Student Services office of each campus maintains a directory of services that available, with the community, to assist those who have suffered a criminal act. These services are usually free and are provided by the community. During orientation of students, faculty and staff, procedures are outlined to cover the reporting of all criminal acts.

1. **Campus Sex Crimes Prevention Act**

The Federal Camus Sex Crimes Prevention Act became effective on October 27, 2002 and requires all eligible institutions participating in Title IV federal Student Aid programs to issue a statement advising the campus community where the state law enforcement agency information concerning registered sex offenders/predators may be obtained. Sex offenders are required to be registered according to the state lay in the state in which they reside and are also required to notify appropriate state officials of each post-secondary school at which the offender is employed or a student. Any such offender is also required to give notice to the appropriate state authorities of any changes in enrollment or employment status at the postsecondary school.

Registered Sex Offender Information

- **Campuses located in Missouri**

  The Missouri Sex Offender Registry can be accessed through the Missouri State Patrol's website. Registered sex offenders throughout the State of Missouri are posted and information listed includes their name, address, date of birth and photo to identify the offender. Information about their offense is also listed.

  https://www.MSHP.DPS.MISSOURI.GOV

  A statewide hotline is provided for questions or concerns regarding a registered sex offender: **1-888-767-6747**

  Additional information in regards to registered sex offenders may be obtained contacting the applicable county:

Jackson County, Missouri	816-524-4302
Platte County, Missouri	816-858-2424
Cass County, Missouri	816-380-5200
Clay County, Missouri	816-792-7614

- **Search Nationwide**

  To search for registered sex offenders anywhere in the United States, the National Sex Offender Registry can be accessed at: https: //www.nsopr.gov

2. **Campus Sexual Violence Elimination Act of 2013 (SaVE Act)**

The Campus SaVE Act requires schools to educate students, staff and faculty on the prevention of rape, acquaintance rape domestic violence, dating violence, sexual assault and stalking. As part of PCI's compliance with the SaVE Act requirements for prevention and awareness, PCI has developed programs that address the specified areas above and provide resources for victims and their family members. All members of the PCI

community may find reference material in regards to these programs in the Students Services office at each campus or in Human Resources.

PCI has and established policy and process for Sexual Misconduct (please refer to the Sexual Misconduct Policy), that provides the framework to the organization's sexual assault prevention program. The following is not an all-inclusive list of some of the highlights of PCI's sexual assault prevention program:

- Always use the "buddy system" when entering or exiting the building(s) at night (i.e. parking lot)
- Leave the building in a group when classes are dismissed, especially after dark
- If an assault occurs, notify the Title IX or Deputy Title IX Coordinator immediately
- Do not disturb the crime scene
- Notify local law enforcement
- Ensure that the victim is safe and seek medical attention, if necessary.
- Secure counseling for the victim, or offer a referral to one of the community based resources (list available in the Sexual Misconduct policy)
- Provide accommodations to the victim, such as schedule changes, etc., if requested.
- Disciplinary actions implemented per policy

Please refer to the PCI's **Sexual Misconduct Policy** to review all procedures, resources and regulations in regards to sexual violence/misconduct. PCI does not tolerate sexual misconduct, in any form, against females or males, whether committed by a stranger or by an acquaintance. PCI attempts to protect all members of its community, including visitors, from any form of sexual misconduct and offers all members of the PCI community that subjected to any type of sexual misconduct within the context of the PCI community, the support necessary to enable them to continue and pursue their academic and career goals.

Reporting the Sexual Assault/ Misconduct

All PCI employees, including faculty, staff, administrators and student employees who have a responsibility for student welfare are required to share with a member of the Title IX team any report of sexual assault/misconduct they receive or of any which they become aware.

All PCI community members, even those who are not obligated by this policy, are strongly encouraged to report information regarding any incident of sexual misconduct to a member of the Title IX team.

The Title IX team/coordinator will ensure that the PCI responds to all reports in a timely, effective and consistent manner. The PCI Title IX team consists of the Title IX Coordinators and the Deputy Title IX Coordinators, the Executive Director of Human Resources, as applicable, the Executive Director of the campus, as applicable and the President. The team is charged with the review, investigation and resolution of all reports to ensure consistent responsiveness and the integrated provision of interim measures to support the individuals involved and to protect the campus community. It is only through this consistent and informed response that we create culture of accountability and break the culture of silence. The Title IX team is positioned to provide seamless support, assess campus safety and effectively respond to allegations of sexual misconduct.

PCI will promptly and thoroughly investigate and respond to all reports of sexual misconduct. PCI will respond to all reports in an integrated, consistent manner that treats each individual with dignity and respect. PCI will approach each report with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

PCI is committed to providing a variety of welcoming and accessible means so that all instances of sexual misconduct will be reported. PCI also recognizes that the decision whether or not to report sexual misconduct is personal, and that there are many barriers to reporting, both individual and societal. Not every individual will be prepared to make a report to PCI or to law enforcement, and individuals are not expected or required to pursue a specific course of action.

An incident does not have to occur on campus to be report to PCI. Off-campus conduct that adversely affects PCI or the PCI community also falls under this policy.

An individual does not have to decide whether or not to request disciplinary action at the time the report is made. PCI recognizes that choosing to make a report, and deciding how to proceed after making the report, can be a process that unfolds over time. PCI will respect an individual's autonomy in making these important decisions and provide support that will assist each individual in making that determination.

<u>FOR FURTHER INFORMATION ON REPORTING, RESOURCES OR INFORMATION ON PCI'S SEXUAL MISCONDUCT POLICY AND PROCEDURES, PLEASE REFER TO THE SEXUAL MISCONDUCT POLICY.</u>

3. **Emergency Response and Evacuation Procedures**

PCI has, in place at each campus, a campus response protocol. In an emergency or dangerous situation, upon confirmation from the President, or designee, of the need for mass notification, the Campus Executive Director, or designee, will, without delay, taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Emergency or dangerous situations may include, but are not limited to, gas leaks, tornadoes, contagious viruses, etc.

A. Emergency Notifications

In the event of an emergency or a dangerous situation that poses an immediate threat to the campus community, PCI may utilize some, or all, of its mass notification capabilities to notify its campus community. These capabilities include email, voice mail, and/or text messaging to alert the campus community. In addition, members of the administration will post relevant updates and advisories on the appropriate school website (https://www.pcitraining.edu) and campus bulletin boards. The President and Campus Executive Directors, or designees, will simultaneously use the local means at his/her/their disposal to notify all PCI community members of the situation, as well as, disseminate pertinent information to relevant public entities.

This emergency notification requirement does not replace the timely warning requirement described earlier. They differ in that the timely warning applies only to the Clery reportable crimes, while the emergency notification requirement, and addresses a much wider range of threats. However, and institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances, but must provide adequate follow-up information to the community, as needed.

Training, exercises and tests will be conducted annually by management at the campus level and by the individuals relevant to the mass notification. Management will document each test conduct by all relevant entities.

B. Student "Must Know" - Emergency Information

Each PCI campus takes various precautionary measures to protect the students, staff, faculty and visitors. Nevertheless, unavoidable emergencies may occur in extreme situations. Therefore, each campus has a Campus Response Team (CRT) that implements and oversees the campus response to a crisis situation. The CRT receives training in dealing with crisis situations and will primarily direct the immediate response to a crisis situation until the arrival of law enforcement and emergency response personnel.

In order to make this program effective, students are required to familiarize themselves with the following emergency procedures. Nothing herein precludes any student, staff or faculty from contacting the appropriate local authorities in the event they feel the threat of physical harm or imminent danger.

***** In the event of an emergency - dial 9-1-1 *****

C. Student Emergency Responses

There is the potential for students to be involved in a variety of emergency situations for which appropriate actions must be taken. These possible situations include incidences that may require emergency evacuation, emergency lockdown, external lockdown or to shelter in place.

- **Emergency Evacuation:** Evacuation is the movement of campus occupants from a dangerous or potentially dangerous location to a safe location. There are two types of evacuation: a fire evacuation and a non-fire evacuation.
    - Fire Evacuation
        - Evacuation is mandatory when a fire alarm is activated.
        - Follow authorized personnel's (e.g. faculty, staff or fire department personnel, etc.) instructions, if given
        - Do not use elevators
        - Assist people with disabilities, if possible
        - Do not attempt to reenter the facility unless and until directed to do so by authorized personnel.
        - Evacuate to a safe distance and location from the building affected, away from any fire hydrants, fire lanes and not under any power lines.
    - Non-fire Evacuation
        - Will be initiated by campus personnel
        - Follow campus personnel's instructions, if given
        - Do not use elevators

    - Assist people with disabilities, if possible.
    - Do not attempt to reenter the facility unless directed to do so.
- **Emergency Lockdown:** Emergency lockdown is used to dramatically and rapidly enhance the level of security on a campus. By locking all exterior, interior and classroom doors, staff can make it more difficult for dangerous person(s) in the vicinity of the campus and in the campus to gain access to staff and students;
    - Lock or barricade doors of office, classrooms and internal student/faculty areas of congregation
    - Close blinds, turn off lights
    - Remain quiet and out of sight
    - If gunshots are heard, lie on the floor and attempt to use available resources for additional cover and concealment.
    - If outside when a lockdown is declared, seek shelter away from the danger.
    - If a fire alarm is activated during the lockdown, proceed with extreme caution.
    - Do not open any door for people claiming to be public safety personnel unless you have an opportunity to view photo identification or are instructed to do so by a staff member that you recognize.
- **External Lockdown:** External lockdown creates a physical layer of security between the internal and external dimensions of the campus. In addition to locked entrances, this may also include a supervised entry and exit to campus facilities, and/or barricade to campus property (e.g. barricades or chains restricting access to campus parking or grounds). This lockdown allows staff and students to continue activities while maintaining access control to the campus and remain in an elevated state of security.
    - Remain in classroom
    - Follow faculty and staff instructions
    - Remain attentive to any changes in status
- **Shelter in Place:** Sheltering in place procedures are traditionally utilized when: (1) a tornado has been spotted, or (2) there has been a chemical or biological incident outside of, but in the proximity to a campus and available information indicates that there is no adequate time to evacuate building occupants to another safe location before the dangerous contaminants reach the facility.
    - Follow staff and faculty instructions
    - Assist people with disabilities, if possible
    - If you are outside when a shelter in place is declared, immediately seek an interior room or hallway with no windows.
    - Close windows and doors - do not lock doors
    - Remain in shelter until an "all clear" is given.

D. Staff and Faculty "Must Know" - Emergency Information

PCI takes various precautionary measures to protect the students, faculty, staff and campus visitors. Nevertheless, unavoidable emergencies may occur in extreme situations. Therefore, each campus has a Campus response team (CRT) that implements and overseas the campus response to a crisis situation The CRT receives training in dealing with crisis situations and will primarily direct the immediate response to a crisis situation until the arrival of law enforcements or emergency response personnel.

In order to make this program effective, all staff, faculty and administrations are expected to familiarize themselves with the following emergency procedures.

Staff Response:

- All staff located outdoors should quickly gather all students and individuals in the area and instruct them to go inside the facility immediately. Once inside, if possible, instruct everyone to move to an interior area without or away from windows or doors.
- Close all windows and doors.
- In the event of a chemical spill / biological incident, if available, use tape to cover all windows and doors with sheets of plastic to help reduce airflow into the area. Wet towels can be used to reduce the airflow under the doors. Close all outside vents. Turn off all heating and ventilation systems, Use damp towels or cloths to cover any openings in walls or doors. Tape can also be used to cover any cracks, crevices, electrical outlets, cable television connections or other openings that might allow air to flow into the shelter area.

- Listen to local radio or television news for instructions from emergency management and public safety officials.
- Review emergency evacuation protocols

VI. DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

Pinnacle Career Institute (PCI) is committed to providing its students and employees with a drug and alcohol free workplace and learning environment. Toward that end, PCI prohibits the unlawful possession, use, manufacture, or distribution of unauthorized drugs and alcohol in the workplace, on campuses, or at any PCI sponsored activity. PCI will provide a safe, responsive environment for all students and employees.

There are many people whose job and academic performance and productivity are adversely affected by their dependence on drugs and alcohol. To address this issue, PCI strives to:

- Educate students and employees about alcohol and drug abuse in an effort to encourage responsible decisions around their use.
- Intervene on behalf of students and employees who have experienced negative consequences around alcohol and drugs so as to reduce the harm and manage the risks associated with their use.
- Support students and employees who are in recovery from substance abuse and addiction.
- Promote constructive lifestyles and norms that discourage alcohol and drug abuse, and
- Develop social and physical environments that facilitate alcohol and drug abuse-free lifestyles.

As a part of the commitment to the provision of high quality and effective service to our students, employees and the general public, PCI has a drug and alcohol abuse program in operation. The program is accessible to all members of the PCI community. PCI is committed to the dissemination of drug and alcohol awareness information to students, faculty and all employees.

1. Operation of the Program

PCI has established a drug-free and alcohol abuse awareness program to inform its faculty, staff and students about the dangers of drug and alcohol abuse and the penalties that may be imposed for drug and alcohol abuse violations. The Drug and Alcohol Abuse Prevention Program is available to all faculty, staff and students. As a part of the program, PCI has implemented the following:

a. Annually, employees and students are made aware of PCI's Drug and Alcohol Abuse Prevention Program and Policy by means of email. Additionally, all new employees and students are informed of the program and the policy at new student/employee orientation.
b. In addition to the annual notification, students and employees are offered written material including pamphlets and literature on drug and alcohol abuse. Such material is available in the Student Services office of each campus or in Human Resources.
c. At least once per year, PCI conducts an event where the dangers and impact of drug and alcohol abuse are discussed. Such events are provided to both students and employees free of charge and may include, but are not limited to, wellness fairs, training sessions and workshops. These platforms develop the strengths and skills related to the effective management of drug and alcohol related problem areas.

2. Standards of Conduct

PCI policy prohibits the unlawful possession, use, distribution or manufacture of illicit drugs and/or alcohol on campus or at any PCI sponsored event. The unlawful use of drugs or alcohol is inconsistent with the behavior expected of members of the PCI community. Violations of this policy may result in criminal action, as well as, disciplinary action.

This policy is in place to protect the students, employee and visitors of PCI.

A. Students

PCI is dedicated to providing a quality comprehensive educational program designed to meet and balance the divers and changing educational, social, economic and cultural needs of the community while providing a safe and healthful environment. PCI is committed, not only to learning and to the advancement of knowledge, but also to the education of ethically sensitive and responsible persons. PCI seeks to achieve these goals through sound educational programs and through rules and regulations governing student life that encourage responsibility and respect for the rights and viewpoints of others.

Therefore, the use, sale, distribution, possession of alcohol, or any drug, including prescription medication used in an illegal manner is strictly prohibited and may result in disciplinary action up to, and including, expulsion.

PCI believes that as adult students, all should be responsible for their own actions and be free to pursue

Their educational objectives in an environment that promotes learning, protects the integrity of the academic process and protects the learning community.

Each student shall have access to PCI's rules and regulations concerning student conduct. These rules and regulations are in effect when attending or participating in any class or activity sponsored by PCI or one of its affiliates or partners, either on campus or at an off-campus location.

For further guidance, students are encouraged to refer to the PCI Student Handbook.

B. Employees

While at work, each PCI employee has the responsibility to deliver service in a safe, efficient and conscientious manner. Therefore, the use, sale, distribution, possession of alcohol, or any drug, including prescription medication used in an unauthorized manner is strictly prohibited and may result in disciplinary action up to, and including, termination of employment.

An employee who is believed to be under the influence of alcohol or drugs while at work may be required to report immediately to a clinic to be tested to determine if he or she is under the influence of alcohol or drugs. As a condition of employment, an employee shall notify his or her supervisor of any conviction for an alcohol or drug related offense no later than five (5) days after such arrest/conviction. Failure to give this notification may result in disciplinary action, up to and including termination of employment.

Each employee has access to PCI's rules and regulations governing employee conduct in the PCI Employee Handbook and the PCI Faculty Handbook. These rules and regulations are in effect when on campus in any capacity and participating in any PCI sponsored activities, either on campus or at an off-campus location.

3. Health Risks

A. Alcohol

Alcohol (beer, wine, liquor) has a high potential for physical and psychological dependence as well as resulting in increased tolerance. Possible effects include impaired memory, slurred speech drunken behavior slow onset, vitamin deficiency and organ damage. Overdose may result in vomiting, respiratory depressions, loss of consciousness, and possible death. Withdrawal may include trembling, anxiety, insomnia, vitamin deficiency, confusion, hallucinations, and convulsions. Females who drink alcohol during pregnancy may give birth to infants with Fetal Alcohol Syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk than other youngsters of becoming alcoholics. Alcohol use is often related to acquaintance rape and failure to protect oneself from sexually transmitted diseases (STDs). Additionally, alcohol-related accidents are the number one cause of death in the 16 - 24-year-old age group.

B. Narcotics

Narcotics (including heroin, morphine, hydrocodone, oxycodone, codeine, and others) have a high potential for both physical and psychological dependence, as well as, resulting in increased tolerance. The possible side effects of using narcotics include euphoria, drowsiness, respiratory depression, constricted pupils and nausea. Overdose may result in shallow breathing, clammy skin, convulsions, coma and death. Withdrawal may include irritability, tremors, panic, nausea, chills, and sweating.

C. Other Depressants

Other depressants (including GHB or liquid ecstasy, valium, Xanax, Ambien and barbiturates) have a potential for physical and psychological dependence, as well as, resulting in increased tolerance. The possible side effects include slurred speech, disorientation, appearance of intoxication, and impaired memory. Overdose may result in shallow respiration, clammy skin, dilated pupils, weak and rapid pulse, coma and possible death. Withdrawal may include anxiety, insomnia, tremors, delirium, convulsions, and possible death.

D. Stimulants

Stimulants (including cocaine, methamphetamine, and methylphenidate) have a possible risk of physical dependence and high risk for psychological dependence. Tolerance can develop with all stimulants. The possible side effects include increased alertness, excitation, euphoria, increased pulse rate and blood pressure, insomnia, and decreased appetite. Overdose may result in agitation increased body temperature, hallucinations, convulsions, and possible death. Withdrawal may result in apathy, long periods of sleep, irritability, depression and disorientation.

E. Hallucinogens

Hallucinogens (including MDMA, LSD, Phencyclidine, and others) are less likely to result in physical

dependence, with the exception of phencyclidines and analogs, and vary in terms of psychological dependence, ranging from none to moderate (MDMA) to high (phencyclidine and analogs). Tolerance can develop. Possible side effects include heightened senses, teeth grinding, and dehydration (MDMA and analogs) and hallucinations, altered perception of time and distance in other types of hallucinogens. Overdose may result in increased body temperature and cardiac arrest for MDMA and more intense episodes for LSD. Some hallucinogens may result in muscle aches and depression when in withdrawal (MDMA) or may result in drug seeking behavior.

F. Cannabis

Cannabis includes marijuana, tetrahydrocannabinol (THC), and hashish or hashish oil. All may result in moderate psychological dependence with THC resulting in physical dependence. Tolerance can develop in all forms. Possible effects include euphoria, relaxed inhibitions, increased appetite and disorientation. Overdose may result in fatigue, paranoia, and possible psychosis. Withdrawal may occasionally result in insomnia, hyperactivity and decreased appetite.

G. Anabolic Steroids

Anabolic steroids (including testosterone and others) may result in psychological dependence. Less is known as to their potential for physical dependence and increased tolerance levels. Possible effects may include virilization, edema, testicular atrophy, gynecomastia, acne and aggressive behavior. Effects of overdose are unknown.

Withdrawal may possibly include depression.

H. Inhalants

Inhalants (Including amyl and butyl nitrate, nitrous oxide, and others) vary in their level of psychological dependence, with less known about their potential for physical dependence and tolerance. Possible effects may include flushing, hypotension, and headache, impaired memory, slurred speech, drunken behavior, slow onset, vitamin deficiency, and organ damage. Overdose may result in methemoglobinemia, vomiting, respiratory depression, loss of consciousness, and possible death. Withdrawal may result in agitation, trembling, anxiety, insomnia, vitamin deficiency, confusion, hallucinations, and convulsions.

4. Student and Employee Assistance Programs

Through the resources of local, national and PCI based efforts, assistance is available for those individuals with alcohol and drug abuse problems. PCI offers the following drug and alcohol abuse information, counseling, assistance and services information:

A. Locally Offered Programs for Locations in Missouri

- In an emergency: call 9-1-1.
- First Call Alcohol and Drug Prevention & Recovery 633 E. 63rd Street, Kansas City, MO (913) 233-0747
- Alcoholics Anonymous 3151 Olive Street, Kansas City, MO 64109 (816) 861-6678
- Northland Dependency Services 3917 Broadway Street, Kansas City, MO 64111 (816) 472-4637

B. Locally Offered Programs for Locations in Kansas

- In an emergency: call 9-1-1
- Kansas Department for Children & Families 24 Hour Help line for alcohol & drug abuse services 1-866-645-8216
- Alcoholics Anonymous 801 Massachusetts St, Lawrence, KS (785) 842-0110
- Douglas County Citizens Committee on Alcoholism (DCCCA) 1739 E 23rd Street, Lawrence, KS 66046 (785) 830-8238

C. National Resources

- National Alcohol and Drug Abuse Help Line 1-800-821-4357
- Alcohol Abuse 24 Hour Hotline 1-800-950-7226
- Drug Enforcement Administration: Drug Fact Sheets http://www.justice.gov/dea/druginfo/factsheets.shtml

5. Disciplinary Sanctions

PCI's policy on prohibiting the unlawful possession, use, distribution or manufacture of illicit drugs and/or alcohol on any PCI campus or PCI sponsored event protects the employees, students and visitors of PCI.

A. Sanctions Under the Law

All PCI students and employees are expected to comply with federal, state and local drug and alcohol laws, as well as, PCI policies and procedures. Any student or employee who violates any of these drug and alcohol laws will be reported to the appropriate law enforcement agency and will be subject to prosecution in accordance with the law. Legal sanctions for violation of local, state, and/or federal laws may include, but are not limited to fines, jail, or prison sentences up to ninety-nine (99) years of life. Students who violate the Code of Conduct and federal, state, local other applicable law may be accountable to both PCI and the civil or criminal authorities.

B. School Sanctions

PCI shall, within the scope of applicable federal and state due process requirements, take such administrative or disciplinary action as is appropriate for violations of the Drug and Alcohol Abuse Prevention Policy, PCI Policy and applicable law. In the event that such violation is also a violation of federal, state or local law, PCI may decide to proceed or delay its own disciplinary processes.

1. Students

- Any student demonstrating a violation of the Student Code of Conduct including, but not limited to, the prohibition of possession, use, or distribution of illicit drugs and alcohol, shall be subject to discipline, up to and including expulsion, in accordance with PCI policy and applicable law.
- PCI has adopted a zero tolerance policy regarding underage drinking.
- Students may be asked to participate in a drug and alcohol assistance or rehabilitation program.
- PCI shall vigorously pursue enforcement against students who fail to abide by its standards of conduct. Disciplinary action taken at any PCI campus shall be in effect at all PCI locations.

2. Employees

- Upon receipt of information indicating a drug or alcohol related problem, employees shall be required to submit to a medical examination or drug testing, take leave without pay pending an investigation, and potentially, suffer immediate termination.
- In the event of confirmation of prohibited possession, use or distribution by an employee; administrative or disciplinary action may include, but is not limited to: reprimand, suspension, or termination of employment or a requirement that the employee participate in and/or successfully complete an appropriate rehabilitation program and/or arrest or referral to the appropriate law enforcement.
- Other sanctions may include, but are not limited to, employee counseling sessions, written reprimands, and formal discussions with supervisors, decision-making leave, and leave without pay.
- Any action taken by PCI may be taken immediately

3. Visitors

- Any visitor engaging in any act prohibited by this Policy shall be called on to immediately cease such behavior and shall be subject to other sanctions including referral to law enforcement officials for arrest and prosecution.

C. Federal Financial Aid Sanctions

<u>As of June 17, 2021 with 2021-2022 Financial Aid Award Year, a student having a drug conviction while receiving federal Title IV aid will no longer impact a student's Title Iv Eligibility</u>

6. Biennial Review of the Drug and Alcohol Abuse Prevention Program

This program is the joint responsibility of PCI's Human Resources Department, Financial Aid Department and Compliance Department, as well as, local law enforcement. Notification of the program, including information about health risks and sanctions for violation of this policy will be provided annually to the students and employees of PCI.

The PCI Drug and Alcohol Abuse Prevention Program will be reviewed biennially. PCI is committed to monitoring and assessing the effectiveness of the policy and program and what changes need to be made. PCI ensures the uniform application of sanctions to employees and students. To perform this review, PCI uses both formal and informal assessments.

- Formally, PCI has a Drug and Alcohol Prevention Committee. This committee determines the effectiveness of this program and ensures the standards of conduct are fair and consistently enforced. The formal program review is conducted every two years.
- Informal assessment methods used in the review include administrative overview and informal student surveys.
- Modifications are made to the programs and the expected learning outcomes in an effort to evolve with changes in the student population.

A systematic prescriptive disciplinary process ensures each disciplinary referral is resolved appropriately, and the consequences or sanctions adequately address the nature of the issue. Emphasis is placed on student and employee development and a holistic approach to the student learning and staff development.

Sexual Misconduct Policy

I. PURPOSE AND SCOPE OFPOLICY

1. Statement of Institutional Values

Sexual misconduct of any form is a violation of a person's rights, dignity and integrity. An act of sexual misconduct represents a fundamental failure by a community member to recognize and respect the intrinsic worth and dignity of another. Acts of sexual misconduct are harmful and illegal and will not be tolerated at Pinnacle Career Institute (PCI). Such acts corrupt the integrity of the educational process, are contrary to the mission and values of the PCI community and are against PCI policy.

All members of the PCI community should be free from sexual misconduct in the classroom, the social and recreational environment, as well as the workplace. PCI seeks to foster a climate free from sexual misconduct through a coordinated education and prevention program, the promulgation of clear and effective policies, as well as investigative and grievance procedures that are prompt, equitable, and accessible to all. In response to any reported sexual misconduct, PCI will take all appropriate steps to eliminate the misconduct, prevent its recurrence and address its effects.

In order to foster a climate of respect for oneself and for one another and provide for the safety and security of our community, PCI expects all community members to take action to prevent acts of sexual misconduct. Creating a safe campus environment is the responsibility of all members of the PCI community, both individually and collectively.

In order to achieve equitable results, PCI will carefully review and/or investigate all reports with an earnest intent to understand the perspective and experiences of each individual involved, and provide for fair and impartial evaluation and resolution.

2. Sexual Assault Prevention, Risk Reduction, and Awareness Programs

PCI engages in comprehensive, intentional and integrated programming intended to respond to and prevent sexual assault, domestic violence, dating and stalking that:

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

Educational programming consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention for students and employees that:

- Identify sexual assault, domestic violence, dating violence, and stalking as prohibited conduct.
- Define using definitions provided by the Department of Education, state law, and/or Code of Conduct, what behavior and actions constitute consent to sexual activity in the state of Missouri and explain consent by using the student Code of Conduct.
- Provide a description of safe and positive options for bystander intervention. **Bystander intervention** means safe, effective, and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of harm, including sexual assault, domestic violence, dating violence, or stalking. Bystander intervention includes recognizing situations of potential harm, evaluating the situations and options, and deciding what intervention is appropriate.
- Describe risk-reduction options. **Risk reduction** means options designed to decrease perpetration and bystander interaction and to increase empowerment for victims in order to promote safety