



## **2020 Annual Security and Fire Safety Report**

Information for 2019-2020 Academic Year

This annual report contains the crime statistics for 2019, 2018, and 2017.

All policy statements contained in this report apply to all campuses unless otherwise indicated.

December 18, 2020

Urshan Graduate School of Theology (UGST) has participated in the Title IV Federal Direct Loan program since 2009. As a part of the Program Participation Agreement with the U.S. Department of Education, the Seminary must comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998, typically called the *Clery Act*, as well as the changes made to the *Clery Act* by the Higher Education Opportunity Act of 2008.

This Annual Security Report presents Urshan's security policies, procedures, and programs to the community and those considering the institution in their academic journey. The purpose of the report is to disclose security-related policies and reported crimes in compliance with federal mandates.

### ***Preparing the Annual Disclosure of Crime Statistics***

The procedures for preparing the annual disclosure of crime statistics include reporting statistics to the College community obtained from the following sources: the Wentzville Police Department and Campus Security Authorities. For statistical purposes, crime statistics reported to any of these sources are recorded in the calendar year the crime was reported. A written request for statistical information is made on an annual basis to all Campus Security Authorities (as defined by federal law) and to all College Deans, Directors, and Department Heads.

All of the statistics are gathered, compiled, and reported to the College community via this report, which is published by the office of the Dean of Student Services.

### **Disclosure of Crime Statistics**

Crime statistics are compiled and reported annually to the U.S. Department of Education via the Campus Safety and Security Survey. The data is then published by the Office of Postsecondary Education and is accessible at <http://nces.ed.gov/collegenavigator>. This link is also posted to each school's website for prospective students and employees. At the end of this report are crime statistics reported by year and geographic location for the past three years.

Anyone who wishes to receive a paper copy of the Annual Security Report may request one from the Admissions or the Dean of Student Services Office.

On June 24, 2019, Urshan College (UC) was formally approved to participate in the Title IV Federal Direct Loan program as well. UC was not required to report *Clery* statistics until the 2020 reporting cycle.

### **Geography for Crime Reporting**

In compliance with the *Clery Act*, Urshan reports crime statistics that occur on campus, on public property within or immediately adjacent to the campus, and on or immediately adjacent to off-campus locations used by the institution for school programs or multiple-night overnight stays.

At the time of this report, UGST has no non-campus property or buildings under its ownership or control. Similarly, there are no off-campus properties frequently used by the Seminary for programs or overnight stays.

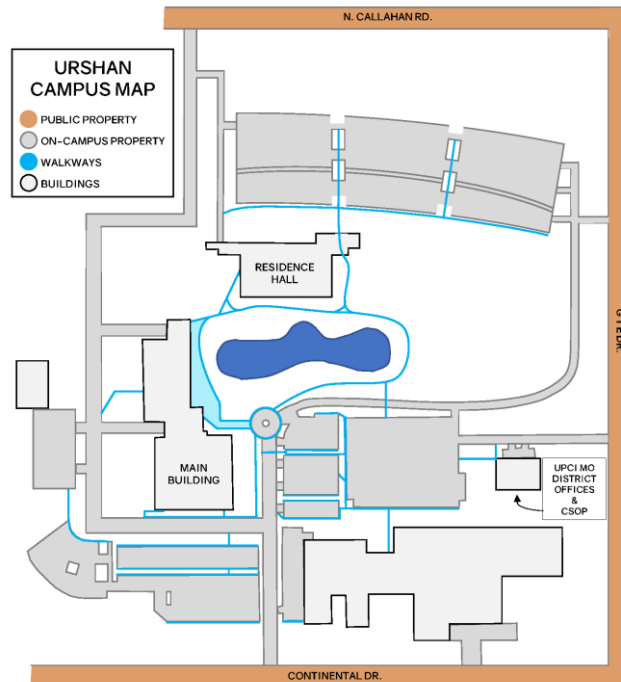
January 1, 2019 – May 30, 2019, UGST's on-campus property included the entire first floor of the Urshan College dormitory wing, access areas, the library, and the parking lot. UGST's public property included the sidewalk adjacent to the parking lot that runs parallel with Howdershell Road. The physical address for these areas included 700 and 704 Howdershell Rd. Florissant, MO 63031.

June 1, 2019, both UC and UGST moved classes to a new shared campus at 1151 Century Tel Dr, Wentzville, MO 63385 (See campus map below).

August 31, 2019 – November 17, 2019, while the on-campus resident hall was being completed, UC ladies were housed at the Fairfield Inn & Suites, 130 Crossroads S Dr, Wentzville, MO 63385; and Hampton Inn, 150 Wentzville Bluffs Dr, Wentzville, MO 63385.

August 31, 2019 – December 13, 2019, while the on-campus resident hall was being completed, UC men were housed at Ramada, 900 Corporate Pkwy, Wentzville, MO 63385.

November 18, 2019 – December 13, 2019, UC ladies were housed in the on-campus resident hall, 1275 Century Tel Dr, Wentzville, MO 63385. UC men did not relocate to the new resident hall until February 2020.



Any crimes that occur in these areas should be reported according to the procedures described in the Reporting and Collecting Crime Statistics section.

### Reporting and Collecting Crime Statistics

The *Clery Act* requires the disclosure of certain types of reported crimes and that certain characteristics about the crimes be compiled. Urshan collects the reported data and coordinates investigations related to Title IX violations when needed. Urshan does not maintain campus police or a security department, however Urshan College maintains a strong working relationship with state and local police agencies, including Wentzville Police Department (WPD).

Currently Urshan has no official written agreements or memorandums of understanding regarding any topics, including the investigation of criminal incidents with local police agencies; however, the Wentzville Police Department (WPD) uses campuses facilities for training purposes throughout the year. WPD officers have patrol jurisdiction on campus, including parking lots and can be seen patrolling throughout the day and night. The WPD officers have the power to make arrests and the authority to enforce State, Local and Federal laws and College Policies. Local law enforcement is engaged for the investigation of alleged crimes that occur on campus, however, in some case, the decision to involve law enforcement is left to the reporting party.

Crimes that should be reported are classified into three categories:

- criminal offenses
- hate crimes
- arrests and referrals for disciplinary action

Criminal offenses to be reported are as follows:

- murder and non-negligent manslaughter
- negligent manslaughter
- forcible sex offenses
- non-forcible sex offenses
- robbery
- aggravated assault
- burglary
- motor vehicle theft
- arson

Hate crimes to be reported are any of the criminal offenses (listed above) plus any of the following:

- larceny-theft
- simple assault
- intimidation
- destruction/damage/vandalism of property that were motivated by bias.

A crime is considered to be motivated by bias if the motivation arose from a bias against the following:

- race
- gender
- religion
- sexual orientation
- ethnicity/national origin
- disability

Arrests and referrals for disciplinary action to be reported are those that result from the following:

- unlawful carrying, possession, or use of weapons
- drug abuse violations
- liquor law violations

When reporting a *Clery* crime, the following is recorded and disclosed:

- Where the crime occurred
- What type of crime occurred
- Who the crime was reported to
- When the crime occurred

### **How to Report Criminal Offenses**

Whether you are student, faculty, staff, or guest, potential criminal activity, suspicious behavior, and any emergency on campus, on public property running through or immediately adjacent to the campus, or in property that is owned or controlled by Urshan should be reported promptly and accurately to the Dean of Student Services and local law enforcement. In the event of a life-threatening emergency, dial 911 from a landline or \*55 from a cell phone. To report a non-life-threatening crime, call the Dean of Student Services at 314-838-8858, ext. 2123 and call the Wentzville Police Department (WPD) at (636) 327-5105.

## **Response to a Report**

WPD Dispatchers are available at these respective telephone numbers 24 hours a day to answer your calls. In response to a call, WPD will take the required action, either dispatching an officer or asking the victim to report to WPD to file an incident report. All reported crimes will be investigated and may become a matter of public record. Internal reports involving a student, which are made to Urshan College officials, will also be forwarded to the Dean of Student Services Office for review. The WPD is responsible for the investigation of any reported crimes and other public safety emergencies. If assistance is required from the Wentzville Fire Department, the 911 dispatchers upon receiving an emergency call will send them. If a sexual assault or rape should occur, staff on the scene will offer the victim a variety of services.

## **Reporting to Meet Disclosure Requirements**

For purposes of including crimes in the annual statistical disclosure and assessing them for issuing a Timely Warning Notices, members of the community are helpful when they immediately report to:

<b>Title</b>	<b>Phone</b>	<b>Extension</b>
Executive Vice President	314-838-8858	2113
Dean of Student Services	314-838-8858	2123
Clery Compliance Officer	314-838-8858	2123
Title IX Coordinator	314-838-8858	2123
Housing Director	314-838-8858	2201
Resident Assistants	314-838-8858	2201
Student Success Center	314-838-8858	2104
Trip Supervisors		
Choir	314-838-8858	3118
Chorale	314-838-8858	3118
United	314-838-8858	3118
Student Group Faculty Advisors		
Student Senate	314-838-8858	2123
Urshan Ministerial Alliance	314-838-8858	3105
31:30	636-627-8457	
Total Focus	314-277-8635	
Urshan Missions Club	314-838-8858	2115
Urshan Outreach Division	314-838-8858	3106
Work Study Supervisors		
Food Services	314-838-8858	3125
Maintenance	314-838-8858	3110
Library Services	314-838-8858	2112
Marketing and Events	314-838-8858	2110
Development Office	314-838-8858	2212
Admissions	314-838-8858	2005

Members of the Urshan community are encouraged to accurately and promptly report crime and emergencies to the Wentzville Police Department, including when the victim of a crime elects to, or is unable to, make such a report.

## **Voluntary Confidential Reporting**

If you are the victim of or witness to a crime and do not want to pursue action within the institution or the criminal justice system, you may still want to consider making a confidential report. With your permission, a report can be filed without revealing your identity. If a report is filed with a police agency, the report becomes public record. You may file a confidential report at the following online websites:

- UC <https://urshancollege.org/about/title-ix-policy/>
- UGST <https://ugst.edu/about/title-ix-policy/>

The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to enhance the future safety of yourself and others. With such information, UC and UGST can keep an accurate record of the number of incidents involving students, employees and visitors; determine where there is a pattern of crime with regard to a particular location, method, or assailant; and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution.

## **Pastoral and Professional Counselors**

Campus “Pastoral Counselors” and “Professional Counselors,” when acting as such, are not considered to be a campus security authority for Clery Act purposes and are *not* required to report crimes for inclusion in the annual disclosure of crime statistics. As a matter of policy, the professional counselors at UC and UGST are encouraged, if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary confidential basis to the Title IX offices.

### *Pastoral Counselor*

An employee of an institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling and who is functioning within the scope of that recognition as a pastoral counselor.

### *Professional Counselor*

An employee of an institution whose official responsibilities include providing psychological counseling to members of the institution’s community, and who is functioning within the scope of his or her license or certification.

The college does encourage pastoral and professional counselors to notify individuals they are counseling of the option to report crimes on an anonymous or confidential basis for inclusion in the annual statistical disclosure of crime statistics.

## **(HEOA) Disclosures to Alleged Victims of Crimes of Violence**

Urshan will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, in writing the results of any disciplinary hearing conducted by the institution against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the institution will provide the results of the disciplinary hearing to the victim’s next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

## **Daily Crime Log**

Urshan does not maintain campus police or a security department, so the institution does not maintain a daily crime log.

## ***Emergency Notification and Timely Warnings***

During orientation of new students and faculty/staff, emergency evacuation procedures are reviewed. Periodic emergency evacuation drills are conducted using the procedures described below.

## **Emergency Response**

UC maintains an Emergency Response Plan that outlines responsibilities of campus units during emergencies. This plan outlines incident priorities, campus organization and specific responsibilities of particular units or positions.

College units are responsible for developing emergency response and continuity of operations plans for their areas and staff. Campus emergency management provides resources and guidance for the development of these plans.

In conjunction with other emergency agencies, the College frequently tests the emergency notification systems on campus. These tests, which may be announced or unannounced, are designed to assess and evaluate the emergency plans and capabilities of the institution.

Each test is documented and includes a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.

The campus publicizes a summary of the emergency response and evacuation procedures via email at least once each year in conjunction with a test (exercise and drill) that meets all of the requirements of the Higher Education Opportunity Act.

## **Emergency/Immediate Notification**

Urshan College has developed a process to notify the campus community in cases of emergency. While it is impossible to predict every significant emergency or dangerous situation that may occur on campus, the following identified situations are examples that may warrant an emergency (immediate) notification after confirmation: armed/hostile intruder; bomb/explosives (threat); communicable disease outbreak; severe weather; terrorist incident; civil unrest; natural disaster; hazardous materials incident and structural fire.

In the event of an emergency, Urshan College will initiate and provide, without delay, immediate notifications to the appropriate segment(s) of the College community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees and visitors.

The Dean of Student Services and or his/her designee is responsible for responding to reported emergencies and confirming the existence of an emergency, sometimes in conjunction with campus administrators, local first responders and/or the national weather center

The Dean of Student Services or designee, in conjunction with other College administrators, local first responders, Public Health Officials and/or the National Weather Service, confirms that there is an emergency or dangerous situation that poses an immediate threat to the health or safety of some of all members of the UC Community, the Dean of Student Services and Executive Vice President will collaborate to determine the content of the message and will use some or all of the systems described below to communicate the threat to the UC Community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

Urshan College will, without delay and 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 judgment of the first responders (including, but not limited to: Dean of Student Services, WPD, and/or the Wentzville Fire and Emergency Medical Services), compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Notification will be made by using some or all of the following methods depending on the type of emergency: Populi texting system (which contains email, cell phone text, voice message alert); fire alarm (where available), social media, webpage and/or in person communication. If any these systems fail or the institution deems it appropriate, in person communication may be used to communicate an emergency.

If necessary, he/she will also notify the Wentzville Police Department.

The verbal announcement for an emergency situation is as follows:

- In case of an earthquake faculty and staff members will alert the individuals on their floor to move only a few steps to a nearby safe place, take cover under and hold onto a piece of heavy furniture or stand against an inside wall.
- In case of a tornado faculty and staff members will alert the individuals on their floor to move in a quick and orderly fashion to the basement of their respective buildings.
- In case of fire faculty and staff members will alert the individuals on their floor to evacuate in a quick and orderly fashion.

<b>System to use</b>	<b>Primary Message Creator</b>	<b>Backup Message Creator</b>	<b>Authority for approving &amp; sending messages</b>	<b>Primary Message Sender/Distributor</b>	<b>Backup Message Sender/Distributor</b>
<b>PRIMARY</b> Populi Text Alert and Email Notification	Dean of Student Services	Executive Vice President	Dean of Student Services, Executive Vice President	Dean of Student Services	Housing Director
<b>SECONDARY</b> Website and Social Media Notification	Dean of Student Services	Executive Vice President	Dean of Student Services, Executive Vice President	Director of Marketing and Events	Assistant to the Director of Marketing and Events



The content of the message will vary depending on the situation. At a minimum, the messages will describe the emergency, provide basic instructions to the community and will direct them to where they can receive additional information.

Follow-up information will be distributed using some or all of the identified communication systems (except fire alarm).

The local news media may be utilized to disseminate emergency information to members of the larger community, including neighbors, parents and other interested parties. The larger community can also access emergency information via the institution's website and/or social media.

If there is an immediate threat to the health or safety of students or employees occurring on campus, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.

### **Emergency Evacuation Procedures**

The emergency evacuation procedures are tested at least twice each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. Urshan College does not tell building occupants in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, Urshan staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of a fire or other emergency. At UC evacuation drills are used as a way to educate and train occupants on fire safety issues specific to their building. During the drill, occupants 'practice' drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm.

### **General Evacuation Procedures**

At the sound of a fire alarm or if you are instructed to evacuate, leave your work area immediately and proceed to the nearest exit, and leave the building. If you are the first to recognize a fire situation, activate the alarm, evacuate to a safe location using the nearest exit, and notify Wentzville Police Emergency or dial 911.

1. Remain Calm
2. Do NOT use Elevators, Use the Stairs.
3. Assist the physically impaired. If he/she unable to exit without using an elevator, secure a safe location near a stairwell, and immediately inform Wentzville PD or the responding Fire Dept. of the individual's location.
4. Proceed to a clear area at least 150 feet from the building. Keep all walkways clear for emergency vehicles.
5. Make sure all personnel are out of the building.

6. Do not re-enter the building.

### **Shelter-in-Place Procedures –What it Means to “Shelter-in-Place”**

If an incident occurs and the buildings or areas around you become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors, because leaving the area may expose you to that danger. Thus, to “shelter-in-place” means to make a shelter of the building that you are in, and with a few adjustments this location can be made even safer and more comfortable until it is safe to go outside.

### **Basic “Shelter-in-Place” Guidance**

If an incident occurs and the building you are in is not damaged, stay inside in an interior room until you are told it is safe to come out. If your building is damaged, take your personal belonging (purse, wallet, access card, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit, and use the stairs instead of the elevators). Once you have evacuated, seek shelter at the nearest College building quickly. If police or fire department personnel are on the scene, follow their directions.

### **How You Will Know to “Shelter-in-Place”**

A shelter-in-place notification may come from several sources, Housing Staff members, other College employees, WPD, or other authorities utilizing the institutions’s emergency communications tools.

### **How to “Shelter-in-Place”**

No matter where you are, the basic steps of shelter-in-place will generally remain the same. Should the need ever arise, follow these steps, unless instructed otherwise by local emergency personnel:

1. If you are inside, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency. If you are outdoors, proceed into the closest building quickly or follow instructions from emergency personnel on the scene.
2. Locate a room to shelter inside. It should be:
  - An interior room;
  - Above ground level; and
  - Without windows or with the least number of windows. If there is a large group of people inside a particular building, several rooms maybe necessary.
3. Shut and lock all windows (tighter seal) and close exterior doors.
4. Turn off air conditioners, heaters, and fans.
5. Close vents to ventilation systems as you are able. (College staff will turn off the ventilation as quickly as possible.)
6. Make a list of the people with you and ask someone (hall staff, faculty, or other staff) to call the list in to Wentzville PD so they know where you are sheltering. If only students are present, one of the students should call in the list.
7. Turn on a radio or TV and listen for further instructions.
8. Make yourself comfortable.

In the event of fire or other emergency, all faculty, staff, and students shall evacuate immediately.

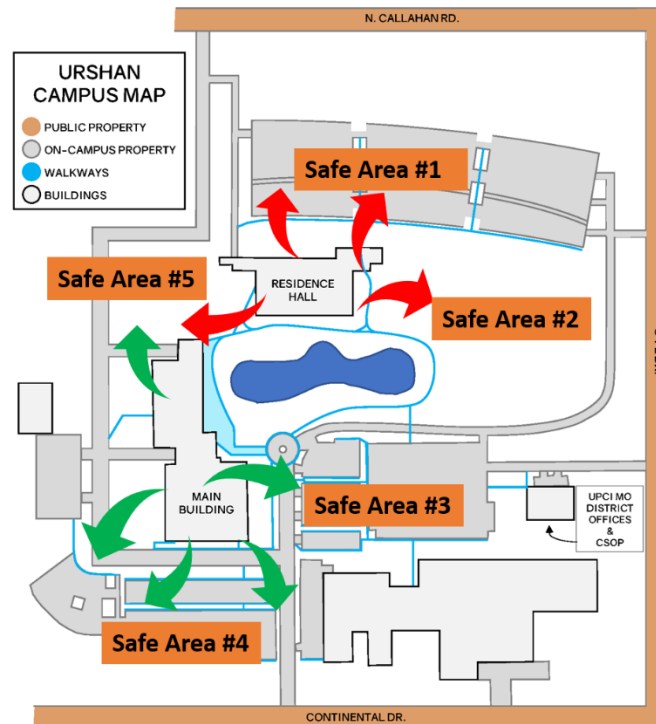
- In the event of an emergency, faculty, staff, and students shall evacuate by means of the marked exit closest to their classroom.

- In the event of a fire, faculty and staff are authorized to use portable fire extinguishers to attempt to extinguish fires before evacuating.

Critical operations shutdown procedures are not required; therefore, no faculty, staff, or students are authorized to delay evacuation for this purpose.

No employees are assigned to perform medical or rescue duties during emergency evacuation situations.

After an emergency evacuation, faculty, staff, and students are to gather in the “safe areas” indicated on the map below:



All members of the Urshan Community should wait in one of the “safe areas” until the “all clear” is given to return to the building by emergency response teams, local law enforcement, the Dean of Student Services, or a facility representative.

After an emergency evacuation, the procedure for accounting for all employees is:

- Faculty and Staff: Report to Dean of Student Services
- Students: Roll call by Resident Assistants and Student Body Presidents

### Timely Warning

A timely warning is not the same as an emergency notification. Timely warnings are issued to students, faculty and staff when deemed necessary after a report of criminal activity if the activity is considered serious or poses a continuing threat. The timely warning is designed to prevent further occurrence of similar crimes.

In the event a crime is reported or a situation arises, within the Urshan Clery Geography (On Campus, Public Property and Noncampus property), that, in the judgment of the Dean of Student Services or designee and in consultation with responsible authorities when time permits, constitutes an serious or continuing threat, a campus wide “timely warning” notice will be issued.

Timely Warnings are typically issued for the following Uniform Crime Reporting Program (UCR)/National Incident Based Reporting System (NIBRS) crime classifications:

- Murder/Non-Negligent Manslaughter
- Aggravated Assault (cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case-by-case basis to determine if the individual is believed to be an ongoing threat to the larger [Abbreviation] community)
- Robbery involving force or violence (cases including pick pocketing and purse snatching will typically not result in the issuance of a Timely Warning Notice, but will be assessed on a case-by-case basis)
- Sexual Assault (considered on a case-by-case basis depending on the facts of the case, when and where the incident occurred, when it was reported, and the amount information known by the Dean of Student Services, or designee). In cases involving sexual assault, they are often reported long after the incident occurred, thus there is no ability to distribute a “timely” warning notice to the community. All cases of sexual assault, including stranger and non-stranger/acquaintance cases, will be assessed for potential issuance of a Timely Warning Notice.
- Major incidents of Arson
- Other Clery crimes as determined necessary by the Dean of Student Services, or his or her designee in his or her absence.

Timely Warning Notices may also be posted for other crime classifications and locations, even though that is not required by the law, at the sole discretion of Urshan College.

Timely Warning Notices will be distributed as soon as pertinent information is available, in a manner that withholds the names of victims as confidential, and with the goal of aiding in the prevention of similar occurrences.

The Dean of Student Services will determine when a timely warning is necessary, and when necessary, will send a timely warning notification text message and corresponding email to all enrolled students, faculty and staff. The Wentzville Police Department will communicate with the institution when a crime occurs that warrants a timely warning to the Urshan community.

Timely Warning Notices are typically written and distributed by the Dean of Student Services, or designee. Timely Warning Notices will be issued to the campus community via email blast to all Urshan assigned email accounts. Timely warnings may also be issued using some or all of the following methods of communication: text messages or emails sent through the college’s Populi alert system, or building postings by Building Administrators.

The institution is not required to issue a Timely Warning with respect to crimes reported to a pastoral or professional counselor.

## ***Policy Statements***

### **Security and Building Access**

During normal business hours the administrative and academic facilities at UC and UGST are open and accessible to students, staff, faculty and visitors of the college. After normal business hours and during breaks, these facilities are locked and only accessible to authorized individuals

Residential facilities at UC are only accessible to building residents and their authorized guests and visitors. Residents are helpful if they avoid allowing unknown individuals access to the residential buildings. Housing staff monitor security in the residential facilities and encourage building residents to report suspicious or unusual activity. UGST does not have any residential facilities

Urshan does not currently have a security department; however, exterior doors remain locked after business hours. Students, Staff, and Faculty are able to enter the building through the use of a key fob system that is placed on strategic doors around the campus that are under constant video surveillance.

Office hours are from 8:00 AM to 5:00 PM, Monday through Friday, during the school year. The building will be open during these times unless otherwise notified.

Students are permitted to use the Student Life Center and Library until curfew each night, unless otherwise notified by the Director of Library Services or Dean of Student Services.

### **Security Considerations Used in the Maintenance of Campus Facilities**

Urshan College maintains campus facilities in a manner that minimizes hazardous and unsafe conditions. Parking lots and pathways are illuminated with lighting. Urshan Facilities Management addresses burned out lights promptly as well as malfunctioning door locks or other physical conditions that enhance security. Other members of the college community are helpful when they report equipment problems to Facilities Management.

### **Security Awareness and Crime Prevention Programming**

During the 2018-2019 academic year, the institution provided 10 crime prevention and security awareness programs. Topics such as personal safety, residence hall security, and sexual assault prevention are some examples of programs offered during the prior academic year.

All crime prevention and security awareness programs encourage students and employees to be responsible for their own security and the security of others. Participants in these programs are asked to be alert, security-conscious and involved and advised to call Wentzville Police Department report suspicious behavior.

### **Monitoring and Recording of Criminal Activity by Students at Noncampus locations of Recognized Student Organizations**

Urshan College does not have officially recognized student organizations that own or control housing facilities outside of the Urshan's core campus. Therefore, local PD is not used to monitor and record criminal activity since there are Noncampus locations of student organizations.

### **Sexual Misconduct Policy and Procedures; Prohibition of Sex-Based Harassment and Discrimination, including Perpetration of the VAWA Crimes**

Urshan College and Urshan Graduate School of Theology (herein "the institution" or "Urshan") prohibits the offenses of domestic violence, dating violence, sexual assault and stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the institution community. Toward that end, the institution issues this statement that Urshan prohibits the offenses of domestic violence, dating violence, sexual assault and stalking and to inform the campus community of our programs to address domestic violence, dating violence, sexual assault and stalking as well as the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, which will be followed regardless of whether the incident occurs on or off campus when it is reported to a Institutional official.

The institution's policy and resolution procedures are called "Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees". The policy may be referred to as such throughout this document or may be shortened to simply "Sexual Misconduct Policy" for ease of reading.

### **Federal Clery Act Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking**

The Clery Act defines the crimes of domestic violence, dating violence, sexual assault and stalking as follows:

- **Domestic Violence:**
  - i. A Felony or misdemeanor crime of violence committed—
    - A) By a current or former spouse or intimate partner of the victim;
    - B) By a person with whom the victim shares a child in common;
    - C) By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
    - D) 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; or
    - E) 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.
  - ii. For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.
- **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.

- i. The existence of such a relationship shall be 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.
  - ii. For the purposes of this definition—
    - A) Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
    - B) Dating violence does not include acts covered under the definition of domestic violence.
  - iii. For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.
- **Sexual Assault** An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."
- **Rape** is defined as 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.
  - **Fondling** is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
  - **Incest** is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
  - **Statutory Rape** is defined as sexual intercourse with a person who is under the statutory age of consent.
- **Stalking:**
  - i. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
    - A) Fear for the person's safety or the safety of others; or
    - B) Suffer substantial emotional distress.
  - ii. For the purposes of this definition—
    - A) *Course of conduct* means two or more acts, including, but not limited to, acts 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.
    - B) *Reasonable person* means a reasonable person under similar circumstances and with similar identities to the victim.

- C) *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- iii. For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

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

Domestic Violence: Missouri's protective order statutes provide the following definitions (Mo. Rev. Stat. § 455.010):

"Domestic violence" is abuse or stalking committed by a family or household member. "Family" or "household member", [includes] spouses, former spouses, any person related by blood or marriage, persons who are presently residing together or have resided together in the past, any person who is or has been in a continuing social relationship of a romantic or intimate nature with the victim, and anyone who has a child in common regardless of whether they have been married or have resided together at any time. In addition, Missouri criminal statutes include various degrees of the crime

"Domestic Assault," as follows:

Domestic Assault, First Degree (Mo. Rev. Stat. § 565.072): A person commits the offense of domestic assault in the first degree if he or she attempts to kill or knowingly causes or attempts to cause serious physical injury to a domestic victim, as the term "domestic victim" is defined under section 565.002. Mo Rev. Stat. § 565.002(6) indicates that a "domestic victim" is a household or family member as the term "family" or "household member" is defined in 455.010, including any child who is a member of the household or family.

Domestic Assault in the Second Degree (Mo. Rev. Stat. § 565.073): A person commits the offense of domestic assault in the second degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and he or she: (1) Knowingly causes physical injury to such domestic victim by any means, including but not limited to, use of a deadly weapon or dangerous instrument, or by choking or strangulation; or (2) Recklessly causes serious physical injury to such domestic victim; or (3) Recklessly causes physical injury to such domestic victim by means of any deadly weapon.

Domestic Assault, Third Degree (Mo. Rev. Stat. § 565.074): A person commits the offense of domestic assault in the third degree if he or she attempts to cause physical injury or knowingly causes physical pain or illness to a domestic victim, as the term "domestic victim" is defined under section 565.002.

Domestic Assault in the Fourth Degree (Mo. Rev. Stat. § 565.076): A person commits the offense of domestic assault in the fourth degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and: (1) The person attempts to cause or recklessly causes physical injury, physical pain, or illness to such domestic victim; (2) With criminal negligence the person causes physical injury to such domestic victim by means of a deadly weapon or dangerous instrument; (3) The person purposely places such domestic victim in apprehension of immediate physical injury by any means; (4) The person recklessly engages in conduct which creates a substantial risk of death or serious



physical injury to such domestic victim; (5) The person knowingly causes physical contact with such domestic victim knowing he or she will regard the contact as offensive; or (6) The person knowingly attempts to cause or causes the isolation of such domestic victim by unreasonably and substantially restricting or limiting his or her access to other persons, telecommunication devices or transportation for the purpose of isolation.

Dating Violence: The institution has determined, based on good-faith research that Missouri law does not define the term dating violence.

Sexual Assault: The institution has determined, based on good-faith research, that Missouri's criminal statutes do not define the term sexual assault. However, Missouri's protective order statutes indicate that "sexual assault" means causing or attempting to cause another to engage involuntarily in any sexual act by force threat of force, duress, or without that person's consent. (Mo. Rev. Stat. § 455.010(1)(e)).

For purposes of the Clery Act, the term "sexual assault" includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Missouri law are as follows:

Rape in the First Degree (Mo. Rev. Stat. § 566.030.1): A person commits the offense of rape in the first degree if he or she has sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.

Rape in the Second Degree (Mo. Rev. Stat. § 566.030.1): A person commits the offense of rape in the second degree if he or she has sexual intercourse with another person knowing that he or she does so without that person's consent.

Fondling: The institution has determined, based on good-faith research, that Missouri law does not define the term fondling.

Incest (Mo. Rev. Stat. § 568.020.1): A person commits the offense of incest if he or she marries or purports to marry or engages in sexual intercourse or deviate sexual intercourse with a person he or she knows to be, without regard to legitimacy, his or her: (1) Ancestor or descendant by blood or adoption; or (2) Stepchild, while the marriage creating that relationship exists; or (3) Brother or sister of the whole or half-blood; or (4) Uncle, aunt, nephew or niece of the whole blood.

Statutory Rape, First Degree (Mo. Rev. Stat. § 566.032.1): A person commits the offense of statutory rape in the first degree if he or she has sexual intercourse with another person who is less than fourteen years of age.

Statutory Rape, Second Degree (Mo. Rev. Stat. § 566.034.1): A person commits the offense of statutory rape in the second degree if being twenty-one years of age or older, he or she has sexual intercourse with another person who is less than seventeen years of age.

Other crimes under Missouri law that may be classified as a "sexual assault" include the following:

Sodomy in the First Degree (Mo. Rev. Stat. § 566.060.1): A person commits the offense of sodomy in the first degree if he or she has deviate sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.

Sodomy in the Second Degree (Mo. Rev. Stat. § 566.061.1): A person commits the offense of sodomy in the second degree if he or she has deviate sexual intercourse with another person knowing that he or she does so without that person's consent.

Statutory Sodomy, First Degree (Mo. Rev. Stat. § 566.062.1): A person commits the offense of statutory sodomy in the first degree if he or she has deviate sexual intercourse with another person who is less than fourteen years of age.

Statutory Sodomy, Second Degree (Mo. Rev. Stat. § 566.064.1): A person commits the offense of statutory sodomy in the second degree if being twenty-one years of age or older, he or she has deviate sexual intercourse with another person who is less than seventeen years of age.

Child Molestation, First Degree (Mo. Rev. Stat. § 566.067.1): A person commits the offense of child molestation in the first degree if he or she subjects another person who is less than fourteen years of age to sexual contact and the offense is an aggravated sexual offense.

Child Molestation, Second Degree (Mo. Rev. Stat. § 566.068.1): A person commits the offense of child molestation in the second degree if he or she: (1) Subjects a child who is less than twelve years of age to sexual contact; or (2) Being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact and the offense is an aggravated sexual offense.

Child Molestation, Third Degree (Mo. Rev. Stat. § 566.069.1): A person commits the offense of child molestation in the third degree if he or she subjects a child who is less than fourteen years of age to sexual contact.

Child Molestation, Fourth Degree (Mo. Rev. Stat. § 566.071.1): A person commits the offense of child molestation in the fourth degree if, being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact.

Sexual Misconduct Involving a Child (Mo. Rev. Stat. § 566.083.1): A person commits the offense of sexual misconduct involving a child if such person: (1) Knowingly exposes his or her genitals to a child less than fifteen years of age under circumstances in which he or she knows that his or her conduct is likely to cause affront or alarm to the child; (2) Knowingly exposes his or her genitals to a child less than fifteen years of age for the purpose of arousing or gratifying the sexual desire of any person, including the child; (3) Knowingly coerces or induces a child less than fifteen years of age to expose the child's genitals for the purpose of arousing or gratifying the sexual desire of any person, including the child; or (4) Knowingly coerces or induces a child who is known by such person to be less than fifteen

years of age to expose the breasts of a female child through the internet or other electronic means for the purpose of arousing or gratifying the sexual desire of any person, including the child.

**Sexual Misconduct, First Degree (Mo. Rev. Stat. § 566.093.1):** A person commits the offense of sexual misconduct in the first degree if such person: (1) Exposes his or her genitals under circumstances in which he or she knows that his or her conduct is likely to cause affront or alarm; (2) Has sexual contact in the presence of a third person or persons under circumstances in which he or she knows that such conduct is likely to cause affront or alarm; or (3) Has sexual intercourse or deviate sexual intercourse in a public place in the presence of a third person.

**Second Degree Sexual Misconduct (Mo. Rev. Stat. § 566.095.1):** A person commits the offense of sexual misconduct in the second degree if he or she solicits or requests another person to engage in sexual conduct under circumstances in which he or she knows that such request or solicitation is likely to cause affront or alarm.

**Sexual Abuse in the First Degree (Mo. Rev. Stat. § 566.100.1):** A person commits the offense of sexual abuse in the first degree if he or she subjects another person to sexual contact when that person is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion.

**Sexual Abuse, Second Degree (Mo. Rev. Stat. § 566.101.1):** A person commits the offense of sexual abuse in the second degree if he or she purposely subjects another person to sexual contact without that person's consent.

**Stalking: Stalking, First Degree (Mo. Rev. Stat. § 565.225):** A person commits the offense of stalking in the first degree if he or she purposely, through his or her course of conduct, disturbs or follows with the intent of disturbing another person and: (1) Makes a threat communicated with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety, the safety of his or her family or household member, or the safety of domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property. The threat shall be against the life of, or a threat to cause physical injury to, or the kidnapping of the person, the person's family or household members, or the person's domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property; or (2) At least one of the acts constituting the course of conduct is in violation of an order of protection and the person has received actual notice of such order; or (3) At least one of the actions constituting the course of conduct is in violation of a condition of probation, parole, pretrial release, or release on bond pending appeal; or (4) At any time during the course of conduct, the other person is seventeen years of age or younger and the person disturbing the other person is twenty-one years of age or older; or (5) He or she has previously been found guilty of domestic assault, violation of an order of protection, or any other crime where the other person was the victim; or (6) At any time during the course of conduct, the other person is a participant of the address confidentiality program under sections 589.660 to 589.681, and the person disturbing the other person knowingly accesses or attempts to access the address of the other person.

**Stalking, Second Degree (Mo. Rev. Stat. § 565.227.1):** A person commits the offense of stalking in the second degree if he or she purposely, through his or her course of conduct, disturbs, or follows with the intent to disturb another person.

As used in the definitions of stalking above, the term "disturbs" shall mean to engage in a course of conduct directed at a specific person that serves no legitimate purpose and that would cause a reasonable person under the circumstances to be frightened, intimidated, or emotionally distressed.

Consent: Consent (as it relates to sexual activity) (Mo. Rev. Stat. § 556.061(14)): Consent or lack of consent may be expressed or implied. Assent does not constitute consent if: (a) It is given by a person who lacks the mental capacity to authorize the conduct charged to constitute the offense and such mental incapacity is manifest or known to the actor; or (b) It is given by a person who by reason of youth, mental disease or defect, intoxication, a drug-induced state, or any other reason is manifestly unable or known by the actor to be unable to make a reasonable judgment as to the nature or harmfulness of the conduct charged to constitute the offense; or (c) It is induced by force, duress or deception.

### **Consent as Defined by Urshan**

While Urshan in no way condones sex outside of marriage or between anyone other than a man and his wife, "Affirmative Consent" means affirmative, conscious, and voluntary agreement to engage in sexual activity between any two persons. Affirmative consent is required for any sexual activity to occur between two or more individuals. It is the responsibility of each person involved in the sexual activity to ensure that the person has the affirmative consent of the other(s) to engage in the sexual activity. Affirmative consent is the concept and definition used by Urshan to determine if a violation of institutional policy occurred in acts of sexual assault.

It shall not be a valid excuse to alleged lack of affirmative consent that the Respondent believed that the Complainant consented to the sexual activity under either of the following circumstances: (a) The Respondent's belief in affirmative consent arose from the intoxication or recklessness of the Respondent, or (b) the Respondent did not take reasonable steps, in the circumstances known to the Respondent at the time, to ascertain whether the Complainant affirmatively consented.

The following are essential elements of affirmative consent:

- *Informed and reciprocal*: All parties must demonstrate a clear and mutual understanding of the nature and scope of the act to which they are consenting and a willingness to do the same thing, at the same time, in the same way.
- *Freely and actively given*: Consent cannot be obtained through the use of force, coercion, threats, intimidation or pressuring, or by taking advantage of the incapacitation of another individual.
- *Mutually understandable*: Communication regarding consent consists of mutually understandable words and/or actions that indicate a mutually unambiguous willingness to engage in sexual activity. Consent may not be inferred from silence, passivity, lack of resistance, previous participation, or lack of active response. An individual who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. *Relying solely upon non-verbal communication can lead to a false conclusion as to whether consent was sought or given.*
- *Not indefinite*: Affirmative consent must be ongoing throughout the activity. *Consent may be withdrawn by any party at any time.* Recognizing the dynamic nature of sexual activity, individuals choosing to engage in sexual activity must evaluate consent in an ongoing manner and communicate clearly throughout all stages of sexual activity. Withdrawal of consent can be an expressed "no" or can be based on an outward demonstration that conveys that an individual

is hesitant, confused, uncertain, or is no longer a mutual participant. Once consent is withdrawn, the sexual activity must cease immediately, which means they must separate their bodies, and all parties must obtain mutually expressed or clearly stated consent before continuing further sexual activity.

- *Not unlimited:* Consent to one form of sexual contact does not constitute consent to all forms of sexual contact, nor does consent to sexual activity with one person constitute consent to activity with any other person. Each participant in a sexual encounter must consent to each form of sexual contact with each participant. Even in the context of a current or previous intimate relationship, each party must consent to each instance of sexual contact each time. The consent must be based on mutually understandable communication that clearly indicates a willingness to engage in sexual activity. The mere fact that there has been prior intimacy or sexual activity does not, by itself, imply consent to future acts.
- *Age:* The State of Missouri considers sexual intercourse with a person under the age of 17 to be unlawful. A person who engages in “unlawful” sexual intercourse as described in Missouri state law does so without affirmative consent as defined by Urshan’s Sexual Misconduct Policy. Reports received that allege sexual contact with a person under the age of 17 will be reported to the City of Wentzville (MO) Police Department (or appropriate law enforcement agency if the act occurred outside of the Wentzville) as this conduct could constitute sexual abuse of children.

#### **A. Force**

“Force” is the use or threat of physical violence to overcome an individual’s freedom of will to choose whether or not to participate in sexual activity or provide consent. Consent obtained by force is not valid. For the use of force to be demonstrated, there is no requirement that a Complainant resist the sexual advance or request. However, evidence of resistance by the Complainant will be viewed as a clear demonstration of a lack of consent.

#### **B. Intimidation**

“Intimidation” is the use of implied threats to overcome an individual’s freedom of will to choose whether or not to participate in sexual activity or provide consent. Consent obtained by intimidation is not valid.

#### **C. Coercion**

“Coercion” is the use of pressure to compel another individual to initiate or continue sexual activity against that individual’s will. Consent obtained through coercion is not valid. Coercion can include a wide range of behaviors, including unwanted pressure, intimidation, manipulation, threats, and blackmail. A person’s words or conduct are sufficient to constitute coercion if they wrongfully impair another individual’s freedom of will and ability to choose whether or not to engage in sexual activity.

Examples of coercion include continuously pressuring someone (“wearing them down” to engage in sexual activity), threatening to “out” someone based on sexual orientation, gender identity, or gender expression (whether true or not) and threatening to harm oneself if the other party does not engage in the sexual activity. When someone indicates, verbally or physically, that they do not want to engage in a particular sexual activity, that they want to stop a particular activity, or that they do not want to go past a certain point of sexual interaction, continued activity or pressure to continue beyond that point can be

coercive. Urshan will evaluate the following in determining whether coercion was used: (a) the frequency of the application of pressure, (b) the intensity of the pressure, (c) the degree of isolation of the person being pressured, and (4) the duration of the pressure.

#### **D. Incapacitation**

“Incapacitation” is a state where an individual cannot make an informed and rational decision to engage in sexual activity because of a lack of conscious understanding of the fact, nature, or extent of the act (e.g., to understand the who, what, when, where, why, or how of the sexual interaction) and/or is physically helpless. For example, an individual is incapacitated, and therefore unable to give consent, if the individual is asleep, unconscious, or otherwise unaware that sexual activity is occurring. An individual will also be considered incapacitated if the person cannot understand the nature of the activity or communicate due to a mental or physical condition.

Incapacitation may result from the use of alcohol, drugs, or other medication. Consumption of alcohol or other drugs alone is insufficient to establish incapacitation.

The impact of alcohol and drugs varies from person to person, and evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs impacts an individual’s: (1) decision-making ability; (2) awareness of consequences; (3) ability to make informed judgments; or (4) capacity to appreciate the nature and the quality of the act. Urshan does not condone the use of alcohol or drugs, however, if the Complainant was under the effects of such drugs at the time of the alleged assault, Urshan will provide amnesty for purposes of this policy to the Complainant and will extend amnesty to witnesses.

It shall not be a valid excuse that the Respondent believed that the Complainant affirmatively consented to the sexual activity if the Respondent knew or reasonably should have known that the Complainant was unable to consent to the sexual activity under any of the following circumstances: (a) the Complainant was asleep or unconscious; (b) the Complainant was incapacitated due to the influence of drugs, alcohol, or medication, so that the Complainant could not understand the fact, nature, or extent of the sexual activity; (c) the Complainant was unable to communicate due to a mental or physical condition.

Whether the Respondent reasonably should have known that the Complainant was incapacitated will be evaluated using an objective reasonable person standard. The fact that the Respondent was actually unaware of the Complainant’s incapacity is irrelevant to this analysis, particularly where the Respondent’s failure to appreciate the Complainant’s incapacitation resulted from the Respondent’s failure to take reasonable steps to determine the Complainant’s incapacitation or where the Respondent’s own incapacitation (from alcohol or drugs) caused the Respondent to misjudge the Complainant’s incapacity.

It is the responsibility of each party to be aware of the intoxication level of the other party before engaging in sexual activity. In general, sexual activity while under the influence of alcohol or other drugs poses a risk to all parties. If there is any doubt as to the level or extent of the other individual’s intoxication, it is safest to forgo or cease any sexual contact or activity.

Being intoxicated by drugs or alcohol is no defense to any violation of this Policy and does not diminish one's responsibility to obtain consent.

### How to Be an Active Bystander

Bystanders play a critical role in the prevention of sexual and relationship violence. They are "individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it."<sup>1</sup> We want to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. Below is a list<sup>2</sup> of some ways to be an active bystander. Further information regarding bystander intervention may be found. If you or someone else is in immediate danger, dial 911. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
2. Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

### Risk Reduction

With no intent to victim blame and recognizing that only abusers are responsible for their abuse, the following are some strategies to reduce one's risk of sexual assault or harassment (taken from Rape, Abuse, & Incest National Network, [www.rainn.org](http://www.rainn.org))

1. **Be aware** of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
2. Try to **avoid isolated areas**. It is more difficult to get help if no one is around.
3. **Walk with purpose**. Even if you don't know where you are going, act like you do.
4. **Trust your instincts**. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
5. **Try not to load yourself down** with packages or bags as this can make you appear more vulnerable.
6. **Make sure your cell phone is with you** and charged and that you have cab money.
7. **Don't allow yourself to be isolated** with someone you don't trust or someone you don't know.
8. **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.
9. **When you go to a social gathering, go with a group of friends**. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
10. **Trust your instincts**. If you feel unsafe in any situation, go with your gut. If you see

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<sup>1</sup> Burn, S.M. (2009). A situational model of sexual assault prevention through bystander intervention. *Sex Roles*, 60, 779-792.

<sup>2</sup> Bystander intervention strategies adapted from Stanford Institution's Office of Sexual Assault & Relationship Abuse

- something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).
11. **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
  12. **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
  13. **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
  14. **If you suspect you or a friend has been drugged, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).** Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).
  15. If you need to get out of an uncomfortable or scary situation here are some things that you can try:
    - a. **Remember that being in this situation is not your fault.** You did not do anything wrong, it is the person who is making you uncomfortable that is to blame.
    - b. **Be true to yourself.** Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
    - c. **Have a code word with your friends or family** so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
    - d. **Find a viable reason to leave.** Present a legitimate reason, even if vague, to leave rather than to stay and be uncomfortable, scared, or worse. Some reasons you could use are: not feeling well, having somewhere else that you need to be, etc.
  16. **Try to think of an escape route.** How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
  17. **If you and/or the other person have been drinking,** you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

### **Programs to Prevent Domestic Violence, Dating Violence, Sexual Assault and Stalking**

In the 2018-2019 academic year, the institution rolled out a two-phased program to train members of the Urshan community on issues related to domestic violence, dating violence, sexual assault, and stalking through the use of Safe Colleges, a digital training platform. The initial phase focused on training staff and faculty ahead of the institution's final accreditation visit. The second phase will include training students and offering programming lead by staff and faculty by the 2020-2021 academic year.



## **Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking Occurs**

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible at SSM Health, St. Joseph's Hospital, 100 Medical Plaza, Lake Saint Louis, MO 63385 or by calling 9-1-1 and asking the dispatcher for the closest hospital to the victim offering forensic evidence collection services. In MO, evidence may be collected even if you chose not to make a report to law enforcement and it is a violation of the federal Violence Against Women Act to require a victim to make a police report as a condition of having evidence collected. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring or may be helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to Institution adjudicators/investigators or police. As soon as the victim is safe, they should also report the incident to Russell Faubert, the institution's Title IX Coordinator. Minimally, protective measures and supports for the victim may be put into place.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult. If a victim chooses not to make a complaint regarding an incident, he or she nevertheless should consider speaking with Campus Public Safety or other law enforcement to preserve evidence in the event that the victim decides to report the incident to law enforcement or the Institution at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

## **Involvement of Law Enforcement and Campus Authorities**

Although the institution strongly encourages all members of its community to report violations of this policy to law enforcement (including local police), it is the victim's choice whether or not to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, the College's Title IX Coordinator, David Reid, will assist any victim with notifying law enforcement if the victim so desires. The Wentzville Police Department may also be reached directly by calling 9-1-1, 636-327-5105, or in person at 1019 Schroeder Creek Blvd. Wentzville, MO 63385. Additional information about the WPD may be found online at: <https://www.wentzvillemo.org/departments/police/index.php>

## **Reporting Incidents of Domestic Violence, Dating Violence, Sexual Assault and Stalking**

If you have been the victim of domestic violence, dating violence, sexual assault, or stalking, you should report the incident promptly to the Title IX Coordinator or Executive Vice President by calling, writing or coming into the office to report in person and/or to Campus Public Safety (if the victim so desires.)

Student reports:

Russell Faubert  
Dean of Student Services

Urshan College & Urshan Graduate School of Theology  
Building A, Room 417  
Office: (314) 838-8858, ext. 2123  
rfaubert@ugst.edu

Employee reports:

Jennie Russell  
Executive Vice President  
Urshan College & Urshan Graduate School of Theology  
Building A, 402 B  
Office (314) 838-8858 ext. 2113  
jrussell@ugst.edu

Reports of all domestic violence, dating violence, sexual assault and stalking made to Campus Public Safety will automatically be referred to the Title IX Coordinator for investigation regardless of if the complainant chooses to pursue criminal charges.

**Procedures Urshan Will Follow When a Crime of Domestic Violence, Dating Violence, Sexual Assault and/or Stalking is Reported**

The institution has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services on and/or off campus as well as additional remedies to prevent contact between a complainant and an accused party, such as changes to housing, academic, protective orders, transportation and working situations, if reasonably available. The institution will make such accommodations or protective measures, if the victim requests them and if they are reasonable available, regardless of whether the victim chooses to report the crime to the local law enforcement. Students and employees should contact Russell Faubert, Title IX Coordinator and Dean of Student Services to request such accommodations.

If a report of domestic violence, dating violence, sexual assault or stalking is reported to the Institution , below are the procedures that the Institution will follow:

<b>Incident Being Reported</b>	<b>Procedure Institution Will Follow</b>
<b>Sexual Assault</b>	<ol style="list-style-type: none"><li>1. Depending on when reported (immediate vs delayed report), institution will provide complainant with access to medical care</li><li>2. Institution will assess immediate safety needs of complainant</li><li>3. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department</li><li>4. Institution will provide complainant with referrals to on and off campus mental health providers</li><li>5. Institution will assess need to implement interim or long-term protective measures, if appropriate.</li></ol>

	<ol style="list-style-type: none"> <li>6. Institution will provide the victim with a written explanation of the victim's rights and options</li> <li>7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate</li> <li>8. Institution will provide written instructions on how to apply for Protective Order</li> <li>9. Institution will provide a copy of the policy applicable to Sexual Assault to the complainant and inform the complainant regarding timeframes for inquiry, investigation and resolution</li> <li>10. Institution will inform the complainant of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is</li> <li>11. Institution will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of sex-based discrimination or for assisting in the investigation</li> </ol>
<b>Stalking</b>	<ol style="list-style-type: none"> <li>1. Institution will assess immediate safety needs of complainant</li> <li>2. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department</li> <li>3. Institution will provide written instructions on how to apply for Protective Order</li> <li>4. Institution will provide written information to complainant on how to preserve evidence</li> <li>5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate</li> <li>6. Institution will provide the victim with a written explanation of the victim's rights and options</li> <li>7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate</li> </ol>
<b>Dating Violence</b>	<ol style="list-style-type: none"> <li>1. Institution will assess immediate safety needs of complainant</li> <li>2. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department</li> <li>3. Institution will provide written instructions on how to apply for Protective Order</li> <li>4. Institution will provide written information to complainant on how to preserve evidence</li> <li>5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate</li> <li>6. Institution will provide the victim with a written explanation of the victim's rights and options</li> <li>7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate</li> </ol>

<b>Domestic Violence</b>	<ol style="list-style-type: none"> <li>1. Institution will assess immediate safety needs of complainant</li> <li>2. Institution will assist complainant with contacting local police if complainant requests AND complainant provided with contact information for local police department</li> <li>3. Institution will provide written instructions on how to apply for Protective Order</li> <li>4. Institution will provide written information to complainant on how to preserve evidence</li> <li>5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate</li> <li>6. Institution will provide the victim with a written explanation of the victim's rights and options</li> <li>7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate</li> </ol>
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### **Assistance for Victims: Rights & Options**

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

- the procedures victims should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred;
- information about how the institution will protect the confidentiality of victims and other necessary parties;
- a statement that the institution will provide written notification to students and employees about victim services within the institution and in the community;
- a statement regarding the institution's provisions about options for, available assistance in, and how to request accommodations and protective measures; and
- an explanation of the procedures for institutional disciplinary action

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

Urshan complies with Missouri law in recognizing orders of protection. Urshan cannot petition for an order or issue any such orders. Anyone who obtains an order as described below should bring a copy of the order to the Title IX Coordinator as discussed more in the information below.

An order of protection is an order issued by a Missouri court pursuant to the Domestic Violence Act that restrains a person from abusing, stalking, sexually assaulting, or harassing another person. Unlike a restraining order, an order of protection carries criminal penalties for violation. An order of protection is valid in every state and should be upheld by law enforcement in every state. There are two types of orders of protection in the State of Missouri: an ex parte order of protection and a full order of protection. An ex parte order of protection is issued by the court before the person against whom the order is directed has received notice of the petition or an opportunity to be heard in court. It is a

temporary order. A full order of protection is issued after a hearing on the record when the person against whom the order is directed has received notice of the proceedings and has had an opportunity to be heard.

The petition must be filed in the county where the petitioner resides, where the alleged incident of domestic violence, stalking, or sexual assault occurred or where the respondent may be served. The circuit clerk's office will provide copies of the forms necessary for the presentation of the petition to the court. Clerks will provide assistance in completing these forms without cost. The location of the office where a petition can be filed will be posted conspicuously in the court building. No filing fees, court costs, or bond will be assessed to the petitioner in a domestic violence/stalking/sexual assault action. An attorney is not needed to obtain an order of protection. Forms also can be found at [www.courts.mo.gov](http://www.courts.mo.gov) by selecting Court Forms > Adult Abuse Forms.

The closest circuit court to campus is the St. Charles County Circuit Court. They are located in the Eleventh Judicial Circuit Court, 300 North 2nd Street, St Charles MO 63301, Main Number **636-949-3080**, Business Hours 8:00 to 5:00. If you obtain an order of protection, bring a copy of said order to Russell Faubert, Title IX Coordinator and Dean of Student Services. The Dean will work with you to create a safety plan to ensure your safety while on campus. This includes things like providing an escort around campus, issuing a special parking permit to allow parking in a variety of types of spaces, and even no trespassing the abuser from campus ground, if applicable. If the order is violated while you are on campus, call 9-1-1 to have an officer respond to campus. Police are required to effect an arrest for a violation of a protective order. If the offender is also a student or employee at Urshan, additional conduct charges may be applied through Urshan's policies and procedures. Complaints of violations of protective orders involving students or employees may be made to the Title IX Coordinator, who will determine which policy has jurisdiction based on what has been reported, if applicable.

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

### **Accommodations and Protective Measures Available for Victims**

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

At the victim's request, and to the extent of the victim's cooperation and consent, institution offices will work cooperatively to assist the victim in obtaining accommodations. If reasonably available, a victim may be offered changes to academic, living, working, protective measures or transportation situations regardless of whether the victim chooses to report the crime to local law enforcement. Examples of options for a potential change to the academic situation may be to transfer to a different section of a

class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall. Possible changes to work situations may include changing working hours or locations. Possible changes in transportation may include having the student or employee park in a different location, assisting the student or employee with a safety escort, etc.

To request changes to academic, living, transportation and/or working situations or protective measures, a victim should contact Russell Faubert, Urshan's Title IX Coordinator

### **On and Off Campus Services for Victims**

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Urshan will provide written notification to students and employees about existing assistance with and/or information about obtaining resources and services including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and assistance in notifying appropriate local law enforcement. These resources include the following:

<b>ON CAMPUS</b>	<b>Type of Services Available</b>	<b>Service Provider</b>	<b>Contact Information</b>
Counseling	A counselor is on campus one day each week to meet with students in Room 416 by appointment.	Ellerie Saucer	(972) 971-4449 <a href="mailto:ellerie.saucer@gmail.com">ellerie.saucer@gmail.com</a>
Health	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Mental Health	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Victim Advocacy	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Legal Assistance	Office of the Title IX Coordinator (Legal Assistance, ask a question, File a Complaint)	Office of the Title IX Coordinator (Legal Assistance, ask a question, File a Complaint)	Building A, Room 417; 314-848-8858, ext. 2123 rfaubert@ugst.edu
Visa and Immigration Assistance	There are no on-campus health services. Please see the off-campus category for this resource.	N/A	N/A
Student Financial Aid	Financial Aid Assistance	Financial Aid	Building A, Room 301, 314-84-8858, ext. 2116

Other	Campus Pastor (Spiritual Support and Confidential Reporting)	Campus Pastor (Spiritual Support and Confidential Reporting)	Building A, Room 416; 314-848-8858, ext. 2117 jmclintock@ugst.edu
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## OFF CAMPUS

Resource	Address	Contact Information
Wentzville Police Department (Law Enforcement)	1019 Schroeder Creek Blvd, Wentzville, MO 63385	636-327-5105
SSM Health – St. Joseph Hospital, Wentzville (Health and Mental Health)	500 Medical Dr. Wentzville, MO 63385	636-327-1000
SSM Health – St. Joseph Hospital, Lake Saint Louis (Health, including SANE Exams, and Mental Health)	100 Medical Plaza, Lake Saint Louis, MO 63367	636-327-5105
St. Charles County Victim Services (Victim Advocacy)	300 N. 2 <sup>nd</sup> St., Suite 601 St. Charles, MO 63301	636-949-7355
Tim Bizelli, Counseling, LLC (Counseling)	835 W Terra Ln. Ofallon, MO 63366	636-345-1106 www.bizellicounselinghelps.com
Behavioral Health Resources (Mental Health and Counseling)	12647 Olive Blvd Creve Coeur, MO 63141	314-469-6644 (24/7 Hotline) 800-811-4760 (24/7 Hotline) www.bhrstl.org
Safe Connections: St. Louis (Victim Advocacy/Support and Legal Assistance)	2165 Hampton Ave. St. Louis, MO 63139	314-531-2003 (24/7 Hotline) 314-646-7500 office)
MO Crisis Line (Victim Advocacy)		888-761-HELP Text HAND to 839863
Life Crisis – Suicide Hotline		314-531-2003
RAINN – National Hotline		800-656-HOPE www.rainn.org
St. Charles County Protective Orders (Orders of Protection)	11 Judicial Circuit Court 300 North 2nd Street St. Charles, MO 63301	636-949-3080
Wentzville Courthouse (for Victim Advocacy and Legal Assistance)	1001 Schroeder Creek Blvd, Wentzville, MO 63385	<a href="tel:6366392193">(636) 639-2193</a>
Visa and Immigration Assistance	To help a victim learn how to apply, contact USCIS at <a href="tel:18003755283">1-800-375-5283</a> , or go to <a href="https://www.dhs.gov/blue-campaign/immigration-assistance">https://www.dhs.gov/blue-</a>	<a href="tel:18003755283">1-800-375-5283</a> , or go to <a href="https://www.dhs.gov/blue-campaign/immigration-assistance">https://www.dhs.gov/blue-</a>

Victims can learn more about applying for a T-Visa and/or U-Visa for victims of certain VAWA crimes who are non-US citizens	<a href="#">campaign/immigration-assistance</a>	
Financial Aid	MO Crime Victim's Compensation Program	<a href="https://dps.mo.gov/dir/programs/cvc/">https://dps.mo.gov/dir/programs/cvc/</a>

Other resources available to persons who report being the victim of sexual assault, domestic violence, dating violence, or stalking, include:

<http://www.rainn.org> – Rape, Abuse and Incest National Network

<http://www.ovw.usdoj.gov/sexassault.htm> - Department of Justice

<http://www2.ed.gov/about/offices/list/ocr/index.html> Department of Education, Office for Civil Rights

The U.S. Department of Education's Office for Civil Rights (OCR) is responsible for overseeing institutional noncompliance with Title IX. To file a report directly with the U.S. Department of Education, use the contact information below.

The OCR office for Missouri is located at:

**Kansas City Office  
Office for Civil Rights  
U.S. Department of Education  
One Petticoat Lane  
1010 Walnut Street, 3rd floor, Suite 320  
Kansas City, MO 64106**

**Telephone: 816-268-0550**

**FAX: 816-268-0599; TDD: 800-877-8339**

**Email: [OCR.KansasCity@ed.gov](mailto:OCR.KansasCity@ed.gov)**

The OCR National Headquarters is located at:

**U.S. Department of Education  
Office for Civil Rights  
Lyndon Baines Johnson Department of  
Education Bldg  
400 Maryland Avenue, SW  
Washington, DC 20202-1100**

**Telephone: 800-421-3481**

**FAX: 202-453-6012; TDD: 800-877-8339**

**Email: [OCR@ed.gov](mailto:OCR@ed.gov)**

### **Confidentiality**

Victims may request that directory information on file with the Institution be withheld by request to Russell Faubert, Title IX Coordinator, using the contact information found above.

Regardless of whether a victim has opted-out of allowing the Institution to share "directory information," personally identifiable information about the victim and other necessary parties will be treated as confidential and only shared with persons who have a specific need-to-know, i.e., those who are investigating/adjudicating the report or those involved in providing support services to the victim, including accommodations and protective measures. By only sharing personally identifiable information with individuals on a need-to-know basis, the institution will maintain as confidential, any accommodations or protective measures provided to the victim to the extent that maintaining such



confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

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

### **Adjudication of Violations**

The institution's disciplinary process includes a prompt, fair, and impartial investigation and resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution's policy and that is transparent to the accuser and the accused. Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within 60 days of the report. However, each proceeding allows for extensions of timeframes for good cause with written notice to the accuser and the accused of the delay and the reason for the delay. Institution officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking as well as how to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. Furthermore, each policy provides that:

1. The accuser and the accused will have timely notice for meetings at which the accuser or accused, or both, may be present;
2. The accuser, the accused and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meeting and hearings;
3. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the accuser or the accused;
4. The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The accuser and the accused each have the opportunity to be advised by an advisor of their choice at any stage of the process and to be accompanied by that advisor to any related meeting or proceeding. The Institution will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding. However, the role of the advisor is limited to advise and support. The advisor may not act as a proxy for the party, disrupt any meeting or proceeding, or receive answers to questions other than general questions regarding the timeframes for the process or other procedural items;
5. The accuser and the accused will be notified simultaneously, in writing, of the any initial, interim and final decision of any disciplinary proceeding; and
6. Where an appeal is permitted under the applicable policy, the accuser and the accused will be notified simultaneously in writing, of the procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding. When an appeal is filed, the accuser and the accused will be notified simultaneously in writing of any change to the result prior to the time that it becomes final as well as of the final result once the appeal is resolved.

Whether or not criminal charges are filed, the institution or a person may file a complaint under the following the institutions Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees.

### **Types of Disciplinary Proceedings Utilized in Cases of Alleged Domestic Violence, Dating Violence, Sexual Assault and Stalking**

The *Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees* has jurisdiction to respond, investigate and adjudicate all claims of sex-based harassment or discrimination, including allegations of being a victim of a VAWA crime. This is an institutional policy and not a replacement for the criminal justice process. The two processes are separate and distinct and a person may engage one process, both processes or neither process.

#### **1. How to File a Disciplinary Complaint Under this Policy**

Anyone can complain of an incident of sex-based harassment or discrimination or gender-based harm and ask that Urshan respond. This would include reporting sexual assault, dating violence, domestic violence and/or stalking. Reports should be made to:

Russell Faubert  
Dean of Student Services  
Urshan College & Urshan Graduate School of Theology  
Building A, Room 417  
Office: (314) 838-8858, ext. 2123  
rfaubert@ugst.edu

#### **2. How the Institution Determines Whether This Policy will be Used**

Urshan has one policy and procedure that applies to all students and all employees. Consequently, when a claim of a VAWA offense is reported, the institution's *Sexual Misconduct and Interpersonal Violence Policy and Resolution Procedure Governing Students and Employees* will apply.

#### **3. Steps in the Disciplinary Process**

Upon receiving a report (either verbally or in writing), the Title IX Coordinator will conduct an initial assessment of the complainant's immediate and ongoing safety and well-being; review the necessity for any interim measures or accommodations; discuss the options for reporting and give the Notice of Complainant's Rights.

As outlined above, the Title IX Coordinator will also consider the interest of the complainant and the complainant's expressed preference for manner of resolution in making a determination on course of action. If informal resolution is an option, the Title IX Coordinator will present this as an option to the parties. The Title IX Coordinator will not permit informal resolution to be utilized, even if both parties express the desire to utilize it, if the misconduct reported included any form of physical violence. (See the section on Informal Resolution for a complete description of this option.) If a third-party report or when a complainant requests to remain

confidential, the Title IX Coordinator will make a determination as to confidentiality balancing the wishes of the complainant with the factors previously listed.

If informal resolution is not an option and/or the Title IX Coordinator determines that the severity of the case does not allow for confidentiality, the Title IX Coordinator will assign the case to a trained investigator(s). Urshan reserves the right to outsource (i.e., hire an external investigator(s)) to conduct an investigation into any complaint in which they feel that the institution's interests (staffing, area of expertise, perceived bias) or the party's best interests (complainant or respondent) would be best served.

Urshan, through a trained investigator(s), will conduct an adequate, reliable and impartial investigation into the facts of the case and will interview the complainant, respondent, witnesses and/or others who may have relevant information. The investigation will also include the collection of evidence deemed relevant to the case including but not limited to electronic or other records of communications between the parties or witnesses (via voice-mail, text message, email and social media sites), photographs (including those stored on computers and smartphones), diagrams and medical records (subject to the consent of the applicable party).

Absent consent of the applicable party, medical and counseling records are privileged and confidential documents that students will never be required to disclose during the resolution of a report under this policy. However, a party may choose to share medical and counseling records as part of the investigation.

The sexual history of a complainant or respondent will never be used to prove character or reputation. Moreover, evidence related to the prior sexual history of either of the parties is generally not relevant to the determination of a policy violation and will be considered only in limited circumstances. For example, if the existence of consent is at issue, the sexual history between the parties may be relevant to help understand the manner and nature of communications between the parties and the context of the relationship, which may have bearing on whether consent was sought and given during the incident in question. However, even in the context of a relationship, consent to one sexual act does not, by itself, constitute consent to another sexual act, and consent on one occasion does not, by itself, constitute consent on a subsequent occasion. In addition, prior sexual history may be relevant to explain the presence of a physical injury or to help resolve another question raised by the report. The investigator will determine the relevance of this information and both parties will be informed if evidence of prior sexual history is deemed relevant.

Prior or subsequent conduct of the respondent may be considered in determining pattern, knowledge, intent, motive, or absence of mistake. For example, evidence of a pattern of sexual misconduct or other forms of prohibited conduct by the respondent may be deemed relevant to the determination of responsibility for the sexual misconduct or other forms of prohibited conduct under investigation. The determination of relevance of pattern evidence will be based on

an assessment of whether the previous or subsequent conduct was substantially like the conduct under investigation or indicates a pattern of similar misconduct.

Urshan will provide the complainant and respondent timely and equal access to information that will be used during any informal and formal process.

Urshan will provide the complainant and respondent an equal opportunity to participate in any process, present evidence and/or witnesses.

The investigator will draft a Preliminary Report, summarizing the fact-finding related to the case. In general, the investigator may choose to not include information that is irrelevant, more prejudicial than probative, immaterial, personal opinion.

At the conclusion of the investigation, the investigator will deliver the report to the Title IX Coordinator, providing only the facts of the matter and not rendering any decision with regard to whether or not sexual misconduct or other forms of prohibited conduct occurred.

The Title IX Coordinator will review the investigator's report for competition or , if necessary, direct the investigator to conduct further investigation.

At the completion of the investigation, the Title IX Coordinator will provide written notice to both parties that the investigation is complete and arrange an opportunity for the parties to review the investigative report.

The complainant and respondent may offer in writing any additional comment or evidence to the Title IX Coordinator at this time, including questions each would like asked of the other party if not previously asked or collected by the investigator. Following receipt of any additional comment or evidence, the investigator will create a Final Report with associated evidence.

If the respondent is an employee, upon receipt of any additional information by the complainant and respondent, or no comments, the Title IX Coordinator will review the report and all related documents and additional comments from the parties. The Title IX Coordinator then will present the Executive Vice President (EVP) with the Final Report and associated evidence and the EVP will make a determination using the preponderance of the evidence of whether or not the respondent is responsible for a policy violation. This proceeding is not open to the public and neither the complainant, respondent nor are witnesses permitted to be present.

If the respondent is a student, upon receipt of any additional information by the complainant and respondent, or no comments, the Title IX Coordinator will review the Final Report and associated evidence, and additional comments from the parties. The Title IX Coordinator then will convene a panel of three College employees (not to include the Title IX Coordinator), provide the panel with the report and associated evidence, and set a time for the parties to appear and the panel to convene. The panel and the parties (along with their advisors of choice) will

convene at the scheduled location and time. The parties may request to not sit in the same space and instead participate in the proceeding via Skype or other video conferencing application. One panel member will be selected by the panel to serve as the Chair and will ask any questions to the parties. The panel will review the report and associated evidence and offer the parties, through the party's advisor, to ask any questions they feel were not asked by the investigator and included in the report. Upon completion of the hearing, the panel will adjourn the proceeding at which time they will, in private, make a determination using the preponderance of the evidence of whether or not the respondent is responsible for a policy violation. This proceeding is not open to the public and neither the complainant, respondent nor are witnesses permitted to be present.

If the accused person is a student, the Title IX Coordinator will determine the sanction. If the accused person is a faculty or staff member, the Executive Vice President will determine the appropriate sanction.

The Title IX Coordinator will communicate decisions regarding responsibility and any sanction(s) to students. The Title IX Coordinator, together with the Executive Vice President, will communicate decisions regarding responsibility and any sanction(s) to faculty and staff members.

The outcome of the investigation, the rationale for the findings, and any sanction(s) imposed shall be simultaneously conveyed to the complainant and respondent in writing by email, U.S. Mail or face-to-face by the Title IX Coordinator. (Private information may also be disclosed to appropriate personnel if deemed necessary by the Title IX Coordinator including, but not limited to a Department Chair, Athletics, Registrar, etc.).

The complainant and the respondent have the right to appeal determinations regarding responsibility. Appeals should be submitted to the Title IX Coordinator in writing within 5 business days of the notice of outcome. Appellate opportunity is equitable, that is both parties have the right to appeal. Appeals should be based on a procedural error or the discovery of new evidence that would substantially change the outcome (evidence that was not discovered during the fact-finding NOT evidence that was not shared and the party now wants shared) or sanction inconsistent with the findings. The Title IX Coordinator will make a determination as to whether the appeal is timely and on appropriate grounds and will provide written notification to both parties. For timely and appropriate appeals, the appeal will be reviewed by The Urshan Student Disciplinary Committee (minus the presence of a student representative) who may adjust the sanctions, return the case to the investigator or overturn if a substantive procedural error that impacted the result.

#### 4. Anticipated Timelines

It is anticipated that the investigation and resolution will not exceed 60 days. However, if the institution determines it will, then a written letter explaining the reason for the delay and the anticipated timeframe for completion will be provided to both the complainant and respondent.

5. Decision-Making Process

The adjudicator will weigh all evidence, including testimonial, documentary, and tangible, to determine if it is more likely than not that the act as alleged occurred. If the adjudicator believes that it is more likely than not, then the adjudicator will find the respondent “responsible” for a violation of institutional policy. If the adjudicator does not find it more likely than not to have occurred, then a finding of “not responsible” will be issued.

6. Standard of Evidence

The institution uses the evidentiary standard of preponderance of the evidence, which means they weigh evidence to determine if it is more likely than not that the act occurred.

7. Possible Sanctions

Student Sanctions for violations of the policy include the following:

- Warning: A written notice to the student, which shall remain in the student’s file.
- Loss/Restriction of Privileges: Denial of specified Student Life privileges for a period of time.
- Discretionary Measures: Restorative justice practices which may include a referral to a counseling center, referral to a wellness program, accountability measures with a pastoral leader, or other measures deemed fitting by Title IX Coordinator, Hearing Panel, or Student Disciplinary Committee.
- Residence Hall Suspension: Separation of the student from the residence halls for a period of time, after which the student is eligible for return to the residence hall. Conditions for readmission may be specified.
- Residence Hall Expulsion: Permanent separation of the student from the residence halls.
- Suspension: Separation of the student from the institution for a definite period of time, after which the student may be eligible to return. Conditions for readmission may be specified. Any student placed on a suspension will be restricted from attending any school-sponsored functions, both on and off-campus, while the suspension is active. Upon return to the institution after a suspension, the student will be considered on Probation/ Student Life Restriction for their first semester. Should violations continue during this probationary period, the student would be subject to immediate expulsion.
- Expulsion: Complete removal of the student from Urshan for an indefinite period of time.

Urshan employee sanctions for violations of this policy may include any combination of the following:

- Written apology to a person, or group, whose rights the respondent may have infringed.
- Mandatory educational programming, which could include alcohol/ drug abuse awareness, sexual harassment prevention training, or batterer intervention instruction.
- Paid or unpaid administrative leave.
- Demotion or reassignment.
- Written notice of unacceptable behavior that is placed in the employee's permanent file.
- Termination of employment.
- Termination of employment with associated "no trespass" notification.

#### 8. Range of Protective Measures Available to a Victim Alleging Misconduct

There are a range of protective measures the institution can put into place upon an allegation of sexual misconduct. These include things like no-contact provisions, no trespass directives, remote participation in meetings and proceedings, changes to class schedules, work locations, parking locations, personal safety escorts, and remote learning. The institution also takes acts of retaliation very seriously and will not tolerate retaliation against a party who is participating in or bringing forth a claim of harm due to a VAWA crime.

#### **Institution-Initiated Protective Measures**

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

The institution will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. The institution must make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

#### **Sex Offender Registration**

In accordance to the "Campus Sex Crimes Prevention Act" of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne *Clery Act* and the Family Educational Rights and Privacy Act of 1974, Urhan is providing a link to the Missouri Sex Offender Registry. This act requires institutions of higher education to issue a statement advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice of each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. In the State of Missouri, convicted sex offenders must register with the Sex Offender Registry maintained by the Missouri State Highway Patrol. Unlawful use of the

information for purposes of intimidating or harassing another is prohibited and willful violation shall be punishable as a Class 1 misdemeanor.

The Missouri State Highway Patrol is responsible for maintaining this registry. Follow the link below to access the Missouri State Highway Patrol website.

<http://www.mshp.dps.mo.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>

### ***Alcohol and Drug Abuse Policy***

The possession, use, and sale of alcohol and illegal drugs are governed by the Urshan Alcohol and Drug Abuse Policy and federal and state laws.

Urshan College prohibits the unlawful possession, use, and sale of alcoholic beverages and illegal drugs on campus. The Wentzville Police Department has primary responsibility for the enforcement of state underage drinking laws and enforcement of Federal and State drug laws.

Laws regarding the possession, sale, consumption or furnishing of alcohol is controlled by the Missouri Division of Alcohol & Tobacco Control (ATC). The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. Federal and state laws are enforced by Urshan, and any violators are subject to institutional disciplinary action, criminal prosecution, fine and imprisonment.

Urshan is an alcohol and drug free campus. Students must refrain from using tobacco in any form, drinking alcoholic beverages, using illegal drugs, or abusing legal drugs.

Students and employees are advised of this policy at orientations and asked to comply with it via their code of conduct. Violation of the code of conduct will result in the institution imposing sanctions up to and including expulsion, termination of employment, and referral for prosecution.

Both students and employees may seek a referral for treatment from the Dean of Student Services, or may call the Center for Substance Abuse Treatment and Referral Hotline at 800-662-HELP (800-662-4357).

### ***Missing Student Notification***

Suspected missing students should be reported immediately to the Wentzville Police Department (WPD). If members of the UC community believe that a student has been missing for 24 hours, it is critical that they report that information to WPD by calling at (636) 327-5105. A student is determined to be missing when the WPD have verified that reported information is credible and circumstances warrant declaring the person missing. Should the WPD investigate and determine that a residential student is missing, Urshan College will notify the missing person contact, if contact information has been provided, within twenty-four (24) hours of the determination that the student is missing by the WPD *If the student is under 18 years of age and is not emancipated, Urshan College will notify the student's custodial parent or guardian.* Regardless of whether the student has identified a contact



person, is above the age of 18, or is an emancipated minor, Urshan College will inform the Wentzville PD (or the local law enforcement with jurisdiction) that the student is missing within 24 hours.

Should the institution be notified of a missing student, the following procedures will be followed:

- If the student lives in student housing, the Resident Assistant (RA) will coordinate with the Housing Director and/or Dean of Student Services to collect as much information as possible on the situation, as well as perform a welfare checkup in the student's room if needed.
- If the student lives off-campus, the Dean of Student Services will enlist the aid of local law enforcement, as well as collect as much information on the student's whereabouts through fellow students, teachers, and acquaintances connected to the institution.
- If the student is located, verification of the student's state of health and well-being will be conducted to determine if additional resources or assistance is needed.
- If the student is not located, the Dean of Student Services will notify the students immediately family, or emergency contact, within 24 hours of receiving a missing student notification.
- If the missing student resides off-campus, family members and friends are encouraged to file an official missing person's report with the local police department. The school will work with local law enforcement throughout the entire process.

## ***Fire Safety Reporting***

### **Annual Fire Safety Report**

In addition to publishing this Annual Security Report, Urshan College is required to publish an Annual Fire Safety Report that contains information about fire safety policies and procedures in student residential facilities as well as statistics for any fires occurring in those facilities.

UGST does not have on campus student housing facilities, so the institution does not maintain a fire log, publish an annual fire safety report, or submit fire statistics to the Department of Education.

To date, there have not been any reported fires on the Urshan campus, or in student housing.

### **Fire Log**

A fire log is available for review at the reception, from 8 a.m.–5 p.m. Monday through Friday, excluding holidays. The information in the fire log includes information about fires that occur in residential facilities, including the nature, date, time, and general location.

### **Policies or Rules on Portable Electrical Appliances, Smoking and Open Flames**

The following are prohibited items (e.g., sources of open flames, such as candles; non-surge protected extension cords; halogen lamps; portable cooking appliances in non-kitchen areas; etc.) or prohibited activities (e.g., smoking in the room; tampering with life safety equipment; etc.).

### **Procedures Students and Employees Should Follow in Case of a Fire**

In the event of a fire, the College expects that all campus community members will evacuate by the nearest exit, closing doors and activating the fire alarm system (if one is present) as they leave. Once safely outside a building, it is appropriate to contact 911. Students and/or staff are informed where to

relocate to by staff if circumstance warrants at the time of the alarm. In the event fire alarms sound, College policy is that all occupants must evacuate from the building, closing doors as they leave. No training is provided to students or employees in firefighting or suppression activity as this is inherently dangerous and each community member's only duty is to exit safely and quickly, shutting doors along the exit path as they go to contain the spread of flames and smoke, and to activate the alarm as they exit. At no time should the closing of doors or the activation of the alarm delay the exit from the building.

### **Fire Safety Education and Training Programs**

Faculty and staff are provided education on fire safety and information on how to report a fire, or evidence of a fire, to whom, and procedures to be followed for non-residential buildings on campus when a fire alarm signals.

Each Urshan College building has fire evacuation plans posted in common areas. All employees are encouraged to become familiar with the escape routes for all buildings and floors and the locations of fire extinguishers, hoses and alarms. In the event of a fire or evacuation, every employee should follow the fire safety evacuation route and vacate the premises until the officials in charge declare the premises safe to enter. Exits and areas around fire extinguishers must be kept clear at all times. Periodic fire safety inspections and drills are held to test equipment and procedures.

### **Procedures for Student Housing Evacuation in Case of a Fire**

In these programs, procedures that students and employees should follow in case of a fire are reviewed and include the following:

- If you hear the fire alarm immediately evacuate the building using the nearest available exit. **Do not attempt to fight a fire unless you have been trained to do so.**
- Awaken any sleeping roommate or suitemates. Prepare to evacuate by putting on shoes and coat if necessary. Feel the doorknob and the door. If they are hot, do not open the door. If they are cool, open slowly, if heat or heavy smoke rushes in, close the door immediately and remain inside.
- When leaving your room, be sure to take your key in case it is necessary to return to the room should conditions in the corridor deteriorate. Make sure to close the door tightly when evacuating.
- Resident life staff members who are present on their floors should facilitate the evacuation of their floor/section if possible. When the alarm sounds shout (Example: there is an emergency in the building leave by the nearest exit) and knock on doors as they make their way to the nearest exit and out the building.
- When exiting in smoky conditions keep your hand on the wall and crawl to the nearest exit. Always know more than one path out of your location and the number of doors between your room and the exit.
- **DO NOT USE ELEVATORS.** Elevator shafts may fill with smoke or the power may fail, leaving you trapped. Elevators have features that recall and deactivate the elevator during an alarm. Standing and waiting for an elevator wastes valuable time.

- Each resident should report to their assigned assembly area. Resident life staff should report to their assigned assembly area and make sure that students have cleared the building. Conduct a head count and do not allow re-entry into the building until directed to do so by emergency personnel.

### Reporting a Fire for Inclusion in the Fire Statistics

Per federal law, Urshan College is required to annually disclose statistical data on all fires that occur in on-campus student housing facilities. Therefore, if you encounter a live fire in one of these facilities, you should immediately get to a safe place, then dial 911. Once the emergency has passed, you should notify Wentzville PD at (636) 327-5105 to investigate and document the incident for disclosure in the College's annual fire statistics.

If a member of the Urshan community finds evidence of a fire that has been extinguished, and the person is not sure whether Wentzville PD has already responded, the community member should immediately notify Wentzville PD at (636) 327-5105 to investigate and document the incident for disclosure in the College's annual fire statistics.

### Plans for Improvement to Fire Safety

The college does not have any planned improvements in fire safety at this time.

### Fire Safety Systems

Residential Facilities	Fire Alarm Monitoring Done On Site	Partial or Full Sprinkler System	Smoke Detection	Fire Extinguisher Devices	Evacuation Plans/Placards	Number of Evacuation (fire) drills each calendar year
1275 Century Tel Dr, Wentzville, MO 63385	No, offsite	Full: sprinkler system in both common areas and individual rooms	82 Smoke detectors in common areas and 1 in each individual room	15	18 total (6 per floor)	2

### Crime Statistics

Reporting years 2017-2018 are for UGST only. UC was officially approved to participate in Title IV Federal Direct Load program beginning with this 2020 Annual Security and Fire Safety Report. The reporting year of 2019 includes both UC and UGST.

Arrests - On-Campus	2017	2018	2019
Weapons: carrying, possessing, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0
Criminal Offenses - On-Campus	2017	2018	2019
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0

Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
<b>Hate Crimes - On-Campus</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Larceny-Theft	0	0	0
Simple assault	0	0	0
Intimidation	0	0	0
Destruction/Damage/Vandalism of property	0	0	0
<b>Arrests - Public Property</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Weapons: carrying, possessing, etc.	0	0	0
Drug abuse violations	0	0	0
Liquor law violations	0	0	0
<b>Criminal Offenses - Public Property</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
<b>Hate Crimes - Public Property</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Murder/Non-negligent manslaughter		0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible (incest and statutory rape only)	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Larceny-Theft	0	0	0
Simple assault	0	0	0
Intimidation	0	0	0

Destruction/Damage/Vandalism of property                      0                      0                      0

## Unfounded Crimes

2017: Zero unfounded crimes.

2018: Zero unfounded crimes.

2019 Zero unfounded crimes.

## Fire Statistics

### Statistics and Related Information Regarding Fires in Residential Facilities for CY 2017

Residential Facilities (Name and Address)	Total Number of Fires in Each Building	Fire Number	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Number of Deaths Related to a Fire	Value of Property Damage Caused by Fire (in USD)
700 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0
704 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0

### Statistics and Related Information Regarding Fires in Residential Facilities for CY 2018

Residential Facilities (Name and Address)	Total Number of Fires in Each Building	Fire Number	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Number of Deaths Related to a Fire	Value of Property Damage Caused by Fire (in USD)
700 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0
704 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0

### Statistics and Related Information Regarding Fires in Residential Facilities for CY 2019

Residential Facilities (Name and Address)	Total Number of Fires in Each Building	Fire Number	Cause of Fire	Number of Injuries That Required Treatment at a Medical Facility	Number of Deaths Related to a Fire	Value of Property Damage Caused by Fire (in USD)
700 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0
704 Howdershell Road, Florissant, MO 63031	0	0	None	0	0	\$0

<b>1275 Century Tel Dr, Wentzville, MO 63385</b>	0	0	None	0	0	\$0
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