PERRY TECHNICAL INSTITUTE

2026 ANNUAL SECURITY REPORT

Jeanne Clery Disclosure of Campus Security Policies and Campus Crime Statistics

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Introduction
Perry Technical Institute (PTI) is committed to providing a safe and secure campus environment. The safety and well-being of students, faculty, staff, and visitors are the foremost concern. PTI prohibits acts of violence, threats of violence, harassment, discrimination, intimidation, dating violence, domestic violence, sexual assault, stalking, and other disruptive behaviors. The best protection against campus crime is a strong security enforcement presence; an aware, informed, and alert campus community; and a commitment to reporting suspicious activities and using common sense when carrying out daily assignments.

PTI works diligently to reduce risk and the potential for crime. Safety and security are a shared responsibility. It is expected of all current and prospective community members to contribute to the safety and security of the campus.

History of the Jeanne Clery Campus Safety Act
The Jeanne Clery Campus Safety Act was advocated by Howard and Connie Clery after their 19-year-old daughter, Jeanne, was raped and murdered in her dorm room at Lehigh University in 1986. Clery's parents lobbied Congress for legislation requiring colleges and universities to publish their crime statistics after learning about 38 violent crimes that had occurred on campus in the three years prior to Clery's murder.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act,) is a federal law requiring colleges and universities to disclose information about campus crime and security policies as well as serve as a reference guide detailing rights and options. The goal is to promote transparency and accountability between institutions and their campus community. All public and private institutions of post-secondary education participating in federal student aid programs are subject to the Clery Act. Campuses that fail to comply with the act can be penalized with large fines and may be suspended from participating in the federal financial aid program.

Annual Security Report
PTI's Facilities & Safety Department is responsible for collecting and reporting crime statistics on a daily and annual basis. These statistics are compiled into a daily crime log and reported annually to the U.S. Department of Education to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as well as state and federal (UCR; Uniform Crime Reports) laws.

The Facilities & Safety Department makes a good faith effort to obtain crime statistics from Campus Security Authorities (CSAs) and local law enforcement agencies.

The Annual Security Report is published on or before October 1st of each year by the Security & Events Manager. The report contains three years' worth of campus crime statistics and the required security policy statements, including, sexual assault policies which assure basic victims' rights, the authority of campus security personnel, and where students should go to report crimes.

The Annual Security Report is e-mailed to all current students and employees annually by the Security & Events Manager via their assigned PTI e-mail address. All prospective students and prospective employees are provided with materials that contain the exact website address for the current Annual Security Report.

The public Annual Security Report website address is:
https://www.perrytech.edu/doc/annual_security_report.pdf

Printed copies may be obtained in person or by writing to the Security & Events Manager at 2011 W. Washington Ave., Yakima, WA 98903, or by calling 509.453.0374 x 5767.

Campus Safety and Security

Prompt Reporting of a Crime or Emergency
Security is achieved through the cooperation and participation of all members of the institute. All staff, faculty, students, and visitors are expected to promptly and accurately report all crimes and public safety-related incidents to the Facilities & Safety Department or the appropriate local law enforcement agency. PTI can notify local law enforcement if a victim is unable to or makes such a request.

Call 911 if the situation poses an immediate threat or if a criminal violation occurred.

Individuals on campus may also report crimes to a designated Campus Security Authority (CSA), which are all PTI employees and contracted security personnel. These designated individuals have significant responsibility for student and campus activities, and as such are provided notice and training by PTI as to the extent of their responsibility and how to report crimes to PTI.

Contact the following authorities to report a PTI related emergency or crime:	
Dial 911	Call to report an emergency or criminal violation
Dial 509.895.5790	Vice President of Facilities & Safety
Dial 509.312.3234	Yakima Campus Security Officer on Patrol
Dial 541.288.8159	Yakima Campus Security Officer on Patrol / Day & Night Patrol
Dial 509.834.9402	Sunnyside Campus Security Officer on Patrol
Dial 509.453.0374	Campus Security Authority, Any PTI Employee
Dial 509.895.5898	Campus Security Hotline, Facilities & Safety Department
Email	security@perrytech.edu

Voluntary Confidential Reporting Options

Online Reporting
The Campus Security Incident Report form is for PTI students, employees, or visitors wishing to communicate information about any security incident, including incidents of sexual harassment or assault in violation of the Anti-Harassment Policy, the Drug and Alcohol Policy, or the Weapons and Violence Policy to the school on your own behalf or on behalf of another person. Reports can be made

anonymously; however, it is encouraged for reporters to identify themselves to allow PTI to better follow-up and respond.

The Campus Security Incident Report form website address is:
https://www.perrytech.edu/students/resources/safety/reporting/submit/

Monitoring and Recording Criminal Activity at Noncampus Locations of Student Organizations
Perry Technical Institute does not currently recognize any student organizations that maintain noncampus locations. Therefore, the institute does not have a policy pertaining to this area. Perry Technical Institute maintains working relationships with local law enforcement agencies and encourages the reporting of criminal activity occurring on campus and at noncampus locations included within the Institute's Clery Act geography.

Response to a Reported Crime
Reported incidents will be forwarded to the appropriate personnel to work with individuals reporting a crime to obtain information, identify potential witnesses, and if necessary, to conduct an investigation in an effort to come to a resolution. When appropriate, crime suspects will be adjudicated through the student conduct system, employee conduct system, or criminal justice system. Information reported to PTI is treated as confidential during the investigation phase, except as required by law. When major incidents occur, the Yakima Police Department, Sunnyside Police Department, or Sherriff's Department may also respond.

Pastoral and Professional Counselors
PTI does not have a pastoral or professional counselor; therefore, the institute does not have a policy pertaining to this area.

Access to and Security of Campus Facilities
Perry Technical Institute is a private institution, open to the public Monday through Thursday from 6:30am to 5:00pm. Outside of business hours, the campus is closed to the public. Access to the facilities is limited and controlled electronically via a card access system. The campus is monitored internally and externally by video surveillance.

All visitors are required to sign in and out at the Visitor Center. Employees, students, and visitors are required to always wear an ID badge while on campus. Employees and students are required to display parking permits in their vehicles while on campus. Security personnel patrol the campus on foot and by vehicle during business hours to monitor activity and ensure policy compliance. After hours, security personnel patrol the campus and perform door checks to ensure the campus is secure.

To protect the safety and welfare of students, employees, and PTI property, all persons on the property under the jurisdiction of PTI behaving in a suspicious or threatening manner will be asked to identify themselves by a PTI official or campus security officer. If any person refuses or fails upon request to present evidence of their identification and/or has no legitimate reason to be on campus, the person will be asked to leave and may be trespassed from the campus if their behavior poses a risk.

Persons who behave in a suspicious or threatening manner or are involved in suspicious or threatening activities must be reported to Campus Security immediately.

Maintenance of Facilities and Grounds
The facilities and grounds are maintained in a manner that minimizes hazardous conditions and improves security through environmental design. Proper lighting and building security are major features in reducing crime on campus. The Facilities and Safety Department routinely checks all lighting, alarm systems, door locks, access control systems, panic & lockdown buttons, and video surveillance systems to ensure they are functioning properly. Repairs are made as quickly as possible.

All members of the campus community must immediately report safety hazards or concerns to the Facilities & Safety Department. Monthly safety meetings are held with students and various employees to identify any of the above concerns and to create awareness.

Campus Security Authority (CSA)
All PTI employees and contracted campus security officers are considered Campus Security Authorities (CSA). These designated individuals have significant responsibility for student and campus activities, and as such are provided notice and training by PTI as to the extent of their responsibility as a CSA and how to report crimes to PTI officials.

Campus Security Personnel
PTI contracts campus security officers through an outside agency. All security officers wear a uniform and patrol the campus in marked security vehicles. Security officers are Campus Security Authorities (CSAs), not sworn police officers. Campus security officers have the authority to detain individuals who break the law or pose a threat to the campus; however, they do not have the authority to arrest individuals. Campus security officers do not share jurisdiction with local law enforcement. Campus security officers will contact the appropriate police department to intervene and stabilize a situation, should the need arise. The responding police department will assume full authority once on PTI property, including the investigation of an alleged criminal offense. Therefore, PTI does not have a written MOU in place with local law enforcement.

Monitoring and Recording of Non-Campus Criminal Activity
PTI's non-campus locations are monitored by CSA's on-site during school hours. All criminal activity is reported to the Facilities & Safety Department or obtained from the Yakima Police Department as contracted campus security personnel do not patrol non-campus locations. Perry Technical Institute maintains working relationships with local law enforcement agencies and encourages the reporting of criminal activity occurring on campus and at noncampus locations included within the Institute's Clery Act geography.

Timely Warnings
A timely warning will be issued to the campus, without delay, if a crime is reported to a Campus Security Authority or local law enforcement agency and poses a serious or ongoing threat to the safety of members of the campus community. The President, Vice President of Facilities & Safety, or Security & Events Manager are responsible for issuing a timely warning. Timely warnings will be distributed when there appears to be a threat to the safety and security of persons on campus for the following crimes:

Criminal Offenses

Murder / Non-negligent Manslaughter
Manslaughter by Negligence
Rape

Fondling
Incest
Statutory Rape
Robbery
Aggravated Assault
Burglary
Motor Vehicle Theft
Arson

Arrests and Referrals for Disciplinary Action

Liquor Law Violations
Drug Law Violations
Weapons Law Violations

Violence Against Women Act Offenses

Domestic Violence
Dating Violence
Stalking

Hazing

Hate Crimes: Evidence that shows the victim was intentionally selected because of the victim's actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability. If any of the following crimes occur due to bias, it will be counted as a Hate Crime.

All Clery Criminal Offenses
Larceny/Theft
Simple Assault
Intimidation
Destruction, Damage, or Vandalism of Property
Hazing

Decisions concerning whether to issue a timely warning will be made on a case-by-case basis using the following criteria:

- Nature of the crime
- Location of the crime
- Continuing threat to the campus community
- Possible risk of compromising law enforcement efforts

If the threat is sudden and serious, a timely warning will be issued as soon as possible and will be continually updated until the threat is contained or neutralized. If a threat is less immediate, the warning will be fully developed and distributed after that point in time.

Crimes that could constitute a continuing threat include, but are not limited to:

- Serial crimes that target certain campus populations such as sex crimes or race-based crimes in which the perpetrator has not been apprehended, and
- Ongoing criminal activity in which there is no apparent connection between perpetrator and victim.

Crimes that would not constitute a continuing threat include, but are not limited to:

- Crimes in which the perpetrator has been apprehended, thereby eliminating the threat, and
- Crimes in which an identified perpetrator targets specific individuals to the exclusion of others, such as domestic violence.

The timely warning content will contain sufficient information about the nature of the threat to allow members of the campus to take protective action:

- A clear statement of the incident
- Possible connection to previous incident(s) if applicable
- Date, time, and location the incident occurred
- Description and image of the suspect, if appropriate
- Risk reduction and safety tips
- Other relevant and important information

The timely warning will be disseminated using any of the following methods, which will ensure the entire campus is likely to receive the warning:

- Public Address System
- In person
- PTI E-mail
- AlertAware
- Text Message

Emergency Response and Notification

PTI's Emergency Procedures describe the responsibilities and duties of employees and students in the event of an emergency or dangerous situation involving an immediate threat. The Emergency Procedures are designed to assist PTI employees and students to respond appropriately when emergency conditions exist. To ensure emergency plans are appropriate, PTI conducts emergency response exercises quarterly. These tests are designed to assess and evaluate the emergency plans and response capabilities of the institution.

How to Report an Emergency

The campus community is encouraged to call 911 to report any situation on-campus that could constitute a significant emergency or dangerous situation involving an immediate or on-going threat to the campus community. Reports must also be made to a Campus Emergency Contact, the Vice President of Facilities & Safety or PTI President, this is the best way to expedite an emergency notification to alert the rest of the campus community of the threat.

Response Procedures for an Emergency or Dangerous Situation

When a serious threat or disaster to the campus community occurs, PTI will coordinate with first responders, which may include the Yakima or Sunnyside Police Departments, Yakima or Sunnyside Fire Departments, and/or the Yakima County Sheriff's Department. Depending on the nature and magnitude of the incident, other local, state, and federal agencies may be called upon for assistance.

Confirming a Significant Emergency or Dangerous Situation
First responders and essential PTI personnel are responsible for initiating emergency warnings. Those responsible include, but are not limited to:

Incident Command Team

- Kaila Lockbeam, Vice President of Facilities & Safety, 509.453.0374 x 5790
- Josh Phillips, Vice President of Information Technology, 509.453.0374 x 5901
- Austin Rodriguez, Security and Events Manager, 509.453.0374 x 5767
- Kody Pitner, Instrumentation Instructor, 509.453.0374 x 5846
- Jason Lamiquiz, President, 509.453.0374 x 5733
- Kevin Booze, Electrical Instructor, 509.453.0374 x 5817
- Tony Nirk, Instrumentation Instructor/Dept. Head, 509.453.0374 x 5848

PTI works in close collaboration with agencies and departments both on and off campus to gather and assess information related to events that may pose an immediate threat or hazard to the campus. The Incident Command Team will investigate all reported incidents to determine if the incident poses an immediate threat to the institution. The Incident Command Team will use the following levels to confirm the significance of an emergency or dangerous situation, and to determine the appropriate segment or segments of the campus community to receive a notification.

> **Minor:** Any incident, potential or actual emergency, which will not seriously affect the overall operations of the school. Only affected individuals or departments will receive an emergency notification.
>
> **Major:** Any incident, potential or actual emergency, which affects a large portion of the campus, and which will disrupt the overall operations of the school. All departments will receive an emergency notification.
>
> **Disaster:** Any incident, potential or actual emergency, which affects the entire campus, and which will seriously impair or halt the operation of the school. In some cases, mass casualties and severe property damage may be sustained. A coordinated effort of all campus and emergency resources is required to effectively help with response to this level of emergency. The entire campus will receive an emergency notification.

After the Incident Command Team confirms and determines the significance of an emergency or dangerous situation, without delay and taking into account the safety of the campus community, they will determine the content of the notification and initiate the notification system. A library of notification statements are scripted for anticipated emergencies and may be found in PTI's Facilities & Safety Department shared folder.

After the content of the notification has been determined a member of the Incident Command Team will initiate the notification system, unless issuing a notification will, in the professional judgement of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The Incident Command Team member will initiate any of the following emergency notification methods:

- Public Address System

- In person
- Phone
- PTI E-mail
- AlertAware
- PTI Website
- Social Media
- Text Message

Emergency Drills, Testing, and Evacuation Procedures
The Vice President of Facilities & Safety and the Security & Events Manager are responsible for scheduling fire drills and ongoing exercises to test emergency response, plans, and capabilities. After each drill or exercise, PTI's Incident Command Team meets to evaluate the effectiveness of the drill and to identify areas of improvement. The Vice President of Facilities & Safety and the Security & Events Manager are responsible for following through on the agreed upon recommendations for improvement.

All drills engage in a process that tests our emergency communication pathways, fire alarms, public address systems, and emergency procedures. After every drill, the test is recorded by the Security & Events Manager in the Emergency Event Log. The details include a description of the drill, date, time the test started and ended, name of person recording the data, and whether the drill was announced or unannounced. This information is kept on file electronically in the Facilities and Safety Department for seven years.

Current Emergency Procedures folders are in every classroom and administrative department on the PTI campus, always making them available. The Vice President of Facilities & Safety and the Security & Events Manager are responsible for keeping these procedures up to date and will send a notice via e-mail to all current employees when changes are made to the procedures and on an annual basis as a reminder. The faculty will train students on changed procedures. The procedures outline detailed processes for various emergency situations that may arise. New employees review the procedures during their orientation with the Facilities & Safety Department. New students review the procedures during their first week of class with their instructor and during PTI 101.

Printed copies may be obtained in person or by writing to the Security & Events Manager at 2011 W. Washington Ave., Yakima, WA 98903, or by calling 509.453.0374 x 5767.

PTI contracts with local vendors to perform annual confidence testing of all fire suppression and fire alarm systems. In addition, public address systems are tested by PTI's IT Department on a quarterly basis.

Student Housing Facilities
PTI does not offer student housing therefore, the institute does not have a policy pertaining to this area.

Non-Campus Property
Students in various programs conduct on-the-job training at off-campus job sites on a daily basis. Due to the distance from the core campus, these sites are considered non-campus. PTI non-campus locations are monitored by CSA's on-site during school hours. All criminal activity is reported to the Facilities & Safety Department or obtained from the Yakima Police Department.

Campus Safety, Crime Prevention, and Security Awareness
PTI takes a proactive approach to preventing crimes on campus. The goal is to eliminate or minimize criminal opportunities and to encourage students and employees to be responsible for their own safety and the safety of others.

During new student and employee onboarding, individuals are empowered to participate as active bystanders and are encouraged to be responsible for their own security and the security of others. Individuals also learn crime prevention tips, reporting options, and situational awareness strategies. Individuals receive a "Quick Connect" resource card which includes information about campus resources, a direct link to PTI's current Annual Security Report, and incident reporting options. During PTI 101, students and employees are informed about the history of the Jeanne Clery Act, PTI's responsibilities under the Jeanne Clery Act, the types of crimes that occur on campus, and prevention resources offered by PTI.

New students review the Student Handbook with their instructor at the beginning of their training; this includes reviewing the Emergency Procedures and the student's responsibility to actively support and participate in the school's effort to provide a safe and healthy environment. After reviewing the content, students are given an opportunity to ask questions.

New employees meet with the Facilities & Safety Department at the beginning of their employment to review pertinent safety and security information; this includes reviewing the Emergency Procedures and the employee's responsibility to participate in their security and the security of others. After reviewing the content, employees are given an opportunity to ask questions.

Throughout the year, the Facilities and Safety Department and Education Department provide students and employees with information on crime prevention, campus security awareness, bystander intervention, and personal protection via emails, TV marketing campaigns, meetings, and flyers.

PTI conducts monthly safety meetings to ensure each department meets safety standards set forth by PTI, OSHA, Department of Labor and Industries, as well as local and state entities. An employee and student representative from each department attends the meeting to report safety concerns or recommendations. The Safety Coordinator follows through on the reports.

Printed copies of the meeting agendas, attendance sheets, and minutes may be obtained in person or by writing to the Safety Coordinator at 2011 W. Washington Ave., Yakima, WA 98903, or by calling 509.453.0374 x 5741.

Life Safety Trainings
All students and employees receive a two-year First Aid, CPR, Bloodborne Pathogens, and Automated External Defibrillator certification during their first quarter of being at PTI. Employees maintain current certifications throughout the duration of their employment.
All employees receive Workplace Fire Safety Training via Safe Colleges during their time at PTI. This training covers topics like maintaining fire extinguishers, when to use a fire extinguisher, how to use an extinguisher, how to prevent fires, and other safe practices for fire response.

Drug-Free and Alcohol-Free Campus and Workplace Policy Statement
In accordance with federal law, Perry Technical Institute has adopted this Drug-Free and Alcohol-Free Campus and Workplace Policy. Perry Technical Institute recognizes that students and employees have a

right to a safe and secure campus and workplace and has implemented a drug and alcohol abuse prevention and assistance program. Furthermore, Perry Technical Institute recognizes that employers who hire students from its programs demand employees who are drug free. PTI has adopted this policy to encourage students to develop a healthy lifestyle and to ensure that graduates are able to meet the demands of employers.

The unlawful manufacturing, distribution, dispensing, possession, or use of any federally banned substance; prescribed medical drugs that were unlawfully obtained or are being unlawfully or abusively used; drug-related paraphernalia; or being under-the-influence of controlled substances are prohibited at Perry Technical Institute, in the workplace, on campus, while engaging in school business, and at any activities sponsored by Perry Technical Institute. Returning or arriving to school after consuming drugs or alcohol is prohibited and will result in immediate dismissal.

Perry Technical Institute enforces institutional policies regarding alcohol and drug use and complies with all applicable federal, state, and local laws. The possession, consumption, or distribution of alcoholic beverages by individuals under the age of 21 is prohibited under Washington State law. Violations of federal or state drug laws and Institute policies may result in disciplinary action, criminal penalties, or both.

PTI complies with section 120(a) through (d) of the *HEA* (Otherwise known as the Drug-Free Schools and Communities Act (DFSCA) of 1989). All required policies and program descriptions are published in the Student and Employee Handbooks. Handbooks are reviewed with new employees and students on or before their first day at PTI and emailed to them annually or as updates are required. PTI conducts an annual review of its Drug and Alcohol Abuse Prevention Program to determine effectiveness and the consistency of sanction enforcement, in order to identify and implement any necessary changes.

PTI's complete drug and alcohol policies and procedures can be found in the Student and Employee Handbooks, and PTI's Sexual Harassment Policies and Procedures.

The Student Handbook can be accessed online at https://perrytech.smartcatalogiq.com/2026-2027/student-handbook. Printed copies may be obtained in person or by writing the Institutional Effectiveness & Research Associate Director at 2011 W. Washington Ave., Yakima, WA 98903, or by calling 509.453.0374 x 5739.

The Employee Handbook can be obtained in person or by writing the Director of Human Resources at 2011 W. Washington Ave., Yakima, WA 98903, or by calling 509.453.0374 x 5774.

Stop Campus Hazing Act (SCHA)

On December 23, 2024, the Stop Campus Hazing Act (SCHA) was signed into law. The SCHA amends the Clery Act and requires institutions to disclose statistics on hazing (to be included in the 2026 report), as well as other policies and procedures to support campus-wide anti-hazing efforts.

The SCHA defines hazing as:

Any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization (e.g., a club, athletic team, fraternity, or sorority); and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the IHE or the organization, of physical or psychological injury including:

- Whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body or similar activity;
- Causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- Causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
- Causing, coercing, or otherwise inducing another person to perform sexual acts;
- Any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- Any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
- Any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

For the purposes of classifying hazing as a Clery crime, a Student Organization is defined as an organization at an institution of higher education [such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government] in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

Policy Statement

Perry Technical Institute prohibits hazing and any conduct that assists another in hazing. Hazing is defined as any action taken or situation created for the purpose of initiation, admission into, affiliation with, or as a means of maintaining continued membership or favor in a recognized or unrecognized group or organization, on or off campus, that:

- Endangers the mental or physical health or safety of a person;
- unreasonably interferes with a person's academic, professional, or personal obligations;
- humiliates, demeans, disgraces, or degrades a person;
- is not relevant to a person's development within the context of the group or organization; or

- the action taken or situation created is excessive and unreasonable within the context of the group or organization.

Examples include but are not limited to:

- Whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
- causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
- causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
- causing, coercing, or otherwise inducing another person to perform sexual acts;
- any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
- any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
- any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

A student group or organization is defined as an organization at an institution of higher education (such as a club, group, or association) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the Institution.

The consent or willingness of the person subjected to hazing, either expressed or implied, is not a defense to hazing.

How to Report Incidents of Hazing
Individuals who experience or witness hazing are encouraged to report the incident immediately, and all reports will be promptly investigated.

To file a report of hazing regarding a student, contact the Vice President of Academic Affairs at 509.453.0374 x 5731. To file a report of hazing regarding an employee, contact the Director of Human Resources at 509.453.0374 x 5774. To file a report of hazing that includes sexual misconduct involving a student or employee, contact the Title IX Coordinator at 509.453.0374 x 5892.

Process Used to Investigate Hazing Incidents
When a report of hazing is received, the Institute will conduct a thorough and timely investigation. The process will be conducted fairly and impartially, and will include interviews with the reporting party, witnesses, and the accused. Interim restrictions may be placed prior to the conclusion of the investigation process, if there is reasonable cause to believe that a group or organization's continued presence poses a significant risk of substantial harm to the health, safety, or welfare of others or poses an imminent or ongoing threat to the disruption of, or interference with, the normal operations of the campus. At the conclusion, findings will be shared with appropriate parties, and disciplinary action may be taken in accordance with institutional policy.

Applicable Local, State, and Tribal Laws on Hazing

Hazing is defined under Washington State Law (RCW 28B.10.900) as any act committed as part of a person's recruitment, initiation, pledging, admission into, or affiliation with a student organization, athletic team, or living group, or any pastime or amusement engaged in with respect to such an organization, athletic team, or living group that causes, or is likely to cause, bodily danger or physical harm, or serious psychological or emotional harm, to any student or other person attending a public or private institution of higher education or other postsecondary educational institution in this state, including causing, directing, coercing, or forcing a person to consume any food, liquid, alcohol, drug, or other substance which subjects the person to risk of such harm, regardless of the person's willingness to participate. "Hazing" does not include customary athletic events or other similar contests or competitions.

Hazing Awareness and Prevention Programs

In an effort to provide the campus community with reliable information and prevention strategies to stop hazing before it occurs, the Institute has developed and adopted mandatory prevention and awareness programs related to hazing. The following information is a description of research-informed campus-wide awareness and prevention programs designed to reach students, staff, and faculty.

- **PTI 101: Harassment and Hazing Prevention**
  All incoming students participate in a PTI 101: Harassment and Hazing Prevention session. This session covers the definition and prohibition of hazing at Perry Technical Institute, provides examples and potential effects of hazing, introduces bystander intervention strategies, and explains how to report incidents of hazing.

- **Safe Colleges: Hazing Awareness and Prevention** (Students)
  Annually, all students complete a Safe Colleges: Hazing Awareness and Prevention online course. This training begins with a pre-assessment to gauge students' understanding of hazing, followed by a detailed explanation of the definition, examples, and potential effects of hazing. It also introduces techniques for identifying and reporting hazing. To complete the course, students must pass a final assessment.

- **Safe Colleges: Hazing Awareness and Prevention** (Employees)
  Annually, all employees complete a Safe Colleges: Hazing Awareness and Prevention online course. This training covers the definition of hazing, provides examples and potential effects, introduces techniques for addressing and preventing hazing, and includes a final assessment that participants must pass to complete the course.

Violence Against Women Act (VAWA)

Preventing and Responding to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Policy Statement

PTI prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking. PTI is committed to providing its community members with an environment conducive to the pursuit of knowledge. PTI carries with it the presumption that students and employees will conduct themselves as responsible members of the campus community, refraining from actions that would endanger the health, welfare, or safety of others. Conduct constituting a sexual offense, such as rape, sexual assault or sexual harassment, will not be tolerated. Students, staff, or faculty committing sexual offenses in any form can be prosecuted under Washington State criminal statutes. In addition, students can be disciplined under the Student Conduct Code and employees can be disciplined under the Employee Conduct Code.

Primary Prevention and Awareness Programs

Students: During their first quarter of training at PTI, students participate in a one-hour session during PTI 101 on the topic of "Your Campus – Your Safety." The objective is to educate students about three federal laws, Title IX, the Clery Act, and the Violence Against Women Act. The training includes how these laws fit with PTI's Anti-Harassment and Sexual Harassment Policies, and how they impact their experience at PTI. Content includes Washington State legal definitions for dating violence, domestic violence, sexual assault, stalking, and consent; as well as discussion about practical scenarios to raise awareness and equip students with prevention strategies. Content also includes tips to stay safe in social settings and on-campus. The training reinforces active bystander intervention and introduces key concepts to reduce inaction and encourage response. Upon completion, students should fully comprehend PTI's stance on sexual assault, sexual harassment, gender-based discrimination, and the non-retaliation policy. Students will know about their rights under Title IX, the Clery Act, and the Violence Against Women Act; and know how to report if they have a complaint or become aware of an incident.

Perry Technical Institute will protect the confidentiality of victims and other necessary parties to the extent permitted by law. Personally, identifying information will not be included in publicly available records, including Clery Act disclosures and statistical reporting. The Institute will maintain the confidentiality of supportive measures and protective accommodations provided to victims to the extent that maintaining such confidentiality does not impair the Institute's ability to provide those measures. Additional information can be found in the Institute's Title IX Sexual Harassment Policy and Procedures

During the first quarter of training at PTI, students participate in a one-hour session during PTI 101 on the topics of substance abuse; which emphasizes the detrimental effects of substance abuse on work performance, safety, and overall employability. This training reinforces safety in social settings.

Employees: During onboarding, the Facilities & Safety Department presents an overview of the history of the Clery Act and the school's obligation to comply. PTI's Annual Security Report is discussed and a campus Quick Connect Card is provided including a link to PTI's Annual Security Report on the school's

website. Policies and procedures are reviewed as they pertain to VAWA, Campus Security Authority responsibilities, and reporting options.

During the first quarter of employment, employees participate in a one-hour session during PTI 101 on the topic of "Your Campus – Your Safety." The objective is to educate employees about three federal laws, Title IX, the Clery Act, and the Violence Against Women Act. The training includes how these laws fit with PTI's Anti-Harassment and Sexual Harassment Policies, and how they impact the experience at PTI. Content includes Washington State legal definitions for dating violence, domestic violence, sexual assault, stalking, and consent; as well as practical scenarios to raise awareness and equip employees with prevention strategies. Content also includes tips to stay safe in social settings and on-campus. The training reinforces active bystander intervention and introduces key concepts to reduce inaction and encourage response. Upon completion, employees should fully comprehend PTI's stance on sexual assault, sexual harassment, gender-based discrimination, and the non-retaliation policy. Employees will know about their rights under Title IX, the Clery Act, and the Violence Against Women Act; and their responsibilities as a Campus Security Authority.

The following definitions are included in the "Your Campus – Your Safety' PTI 101 sessions provided to new students and employees during their first quarter of being at PTI:

Consent:
RCW 9A.44.010(7) Definitions:
(7) "Consent" means that at the time of the act of sexual intercourse or sexual contact there are actual words or conduct indicating freely given agreement to have sexual intercourse or sexual contact.

Dating Violence:
RCW 26.50.010(2) Definitions:
"Dating Violence" has the same definition as "Domestic Violence", except the definition "Dating Relationship" is used instead of "Intimate Partner" to describe the relationship between the parties involved.

(2) "Dating relationship" means a social relationship of a romantic nature. Factors that the court may consider in making this determination include: (a) The length of time the relationship has existed; (b) the nature of the relationship; and (c) the frequency of interaction between the parties.

Domestic Violence:
RCW 26.50.010(3) Definitions:
(3) "Domestic violence" means: (a) Physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, sexual assault, or stalking as defined in RCW 9A.46.110 of one intimate partner by another intimate partner; or (b) physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, or stalking as defined in RCW 9A.46.10 of one family or household member by another family or household member. ; or (c) stalking as defined in RCW 9A.46.110 of one family or household member by another family or household member.

Sexual Assault:
RCW 9A.44
The term sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent.

Stalking:

RCW 9A.46.110 Definitions:

(1) A person commits the crime of stalking if, without lawful authority and under circumstances not amounting to a felony attempt of another crime:

(a) He or she intentionally and repeatedly harasses or repeatedly follows another person; and

(b) The person being harassed or followed is placed in fear that the stalker intends to injure the person, another person, or property of the person or of another person. The feeling of fear must be one that a reasonable person in the same situation would experience under all the circumstances; and

(c) The stalker either:

(i) Intends to frighten, intimidate, or harass the person; or

(ii) Knows or reasonably should know that the person is afraid, intimidated, or harassed even if the stalker did not intend to place the person in fear or intimidate or harass the person.

(2)(a) It is not a defense to the crime of stalking under subsection (1)(c)(i) of this section that the stalker was not given actual notice that the person did not want the stalker to contact or follow the person; and

(b) It is not a defense to the crime of stalking under subsection (1)(c)(ii) of this section that the stalker did not intend to frighten, intimidate, or harass the person.

Stalking Behaviors

- Non-consensual communication including in-person communication, telephone calls, voice messages, text messages, email messages, social networking site postings, instant messages, postings of pictures or information on Web sites, written letters, gifts, or any other communications that are undesired and/or place another person in fear
- Following, pursuing, waiting, or showing up uninvited at a workplace, place of residence, classroom, or other locations frequented by a victim
- Surveillance and other types of observation, whether by physical proximity or electronic means (monitoring phone calls or computer use, GPS systems to track, or hidden cameras)
- Trespassing
- Vandalism
- Non-consensual touching
- Direct physical and/or verbal threats against a victim or a victim's loved ones
- Gathering of information about a victim from family, friends, co-workers, and/or classmates
- Manipulative and controlling behaviors such as threats to harm oneself, or threats to harm someone close to the victim
- Defamation or slander against the victim

Active Bystander Intervention

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 the situation. PTI promotes 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. If you or someone else is in immediate danger, dial 911.

Below is a list of some ways to be an active bystander:

- Watch out for your friends and fellow students or employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
- Confront people who seclude, hit on, or try to make out with, or have sex with people who are incapacitated.
- Speak up when someone discusses plans to take advantage of another person.
- Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
- Refer people to on or off campus resources listed in this document (pg. 20) for support in health, counseling, or with legal assistance.
- Report an incident to someone as it is happening or after the fact. Reporting is a way to follow-through and be an active bystander.

Bystander intervention training is provided to all students and employees. The goal of this training is to reduce risk factors that may increase the likelihood of perpetration, victimization, or bystander inaction.

Risk Reduction Tips

With the goal of empowering victims, no intent to victim blame, and recognizing that only rapists are responsible for rape, the following are some strategies to reduce one's risk of sexual assault or harassment.

- Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Try to avoid isolated areas. It is more difficult to get help if no one is around.
- Walk with purpose. Even if you don't know where you are going, act like you do.
- Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- Consent can be given or removed at any time. You can always say "no" regardless if this is your initial answer or you change your mind after giving consent.
- Make sure your cell phone is with you and charged and that you have money for transportation.
- Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
- Avoid putting headphones with music in both ears so that you can be more aware of your surroundings, especially if you are walking alone.
- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the event, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, call 911 immediately.
- Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone and unaccounted for, get a new one.
- 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 events, don't drink from the punch bowls or other large, common open containers.

- 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 them to a safe place immediately.
- If you suspect you or a friend has been drugged, call 911 immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

If you need to get out of an uncomfortable or frightening situation here are some things that you can try:

- 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.
- 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.
- 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.
- Lie. If you don't want to hurt the person's feelings it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are: Needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
- 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?
- 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.

Ongoing Prevention and Awareness Campaigns
The Facilities and Safety Department and various school personnel distributes materials to students and employees on an ongoing basis; the content is focused on raising the awareness and understanding of what constitutes dating violence, domestic violence, sexual assault, stalking, changing social norms, and advancing prosocial behaviors of individuals and communities. Materials include relevant statistics, videos, and resources specific to our campus community.

Various school personnel and outside presenters talk with students and employees on an ongoing basis on topics such as workplace ethics, anti-harassment and discrimination, and campus culture.

On an annual basis, all employees participate in mandatory training to receive education about three federal laws, Title IX, the Clery Act, and the Violence Against Women Act, including how these laws fit with PTI's Anti-Harassment and Sexual Harassment policies, and how they impact the experience at PTI. Content includes Washington State legal definitions for dating violence, domestic violence, sexual assault, stalking, and consent; as well as participation in practical scenarios to raise awareness and equip employees with prevention strategies.

Reporting
A guiding principle in the reporting of domestic violence, dating violence, sexual assault, and stalking is to avoid possible re-victimizing of the reporting party by forcing the individual into any plan of action. It is recommended that anyone who has experienced dating violence, domestic violence, sexual assault, or stalking consider each of the following:

- Get to a safe place and call 911
- Preserve all physical evidence to assist in proving an alleged criminal offense occurred or to assist in obtaining a protection order.
- File a police report. Victims have the option to notify local law enforcement authorities. The Campus Security Authority (CSA) receiving the report will assist in notifying local law enforcement authorities, if the victim chooses. Victims have the right to decline to notify such authorities.
- Victims can receive a sexual violence exam without reporting to local enforcement authorities.
- Report to a Campus Security Authority (CSA), Title IX Coordinator, or other Responsible Employee under Title IX:
    - Facilities & Safety Department, 509.895.5898
    - All PTI employees and campus security officers are Campus Security Authorities and Responsible Employees.
- Make an anonymous report. An anonymous report to the police notifies them that an act of sexual violence has occurred but gives no names or identification. The decision to report to law enforcement agencies is entirely the victims'.

Written Notification of Rights and Resources

Perry Technical Institute will provide written notification to victims of dating violence, domestic violence, sexual assault, and stalking regarding available counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other available services both within the institution and in the community. PTI will also provide written notification regarding available accommodations, protective measures, and the process for requesting changes to academic, working, transportation, or other situations, regardless of whether the victim chooses to report the incident to law enforcement.

Steps to Preserve Evidence

- As soon as possible, write down, or have a friend write down, everything you can remember about the incident, including a physical description of the assailant. You should attempt to do this even if you are unsure about reporting the incident.
- Do not wash, brush your teeth, douche, use the toilet, change clothing, or disturb the scene of the attack.
- If you have changed your clothes, place your clothing and other items (sheets, blankets) in a brown paper bag (a plastic bag may destroy evidence).
- Go to the local hospital emergency room immediately. Hospital personnel will treat the physical consequences of assault, such as injury, infection, disease, and pregnancy. They can collect evidence that will be needed if the crime is reported. Many hospitals have a specialized examiner who can complete an exam for victims of sexual violence. Such an exam can help the victim receive an appropriate medical assessment and treatment, and can preserve evidence for possible future action.
- A SAFE (rape kit) can only be completed within five days of the assault. You have the right to refuse the entire exam or any part of it at any time.
- Evidence such as texts, emails, social media posts, chats, pictures, videos or other forms of electronic communication can be helpful in a college or criminal investigation. Download, save to a .pdf, take screen shots, or use other methods to preserve electronic evidence.

Protection Orders and Accommodations
A victim can file for applicable protection orders through the Yakima County District Courthouse, located at 128 N. 2nd Street, Rm. 323, Yakima, WA 98901. Forms can also be accessed on the following website: http://www.yakimacounty.us/223/Protection-Orders. If you wish to pursue a legal protection order, the school is available to assist you through the process.

Academic, Workplace, and Protective Accommodations
Perry Technical Institute will provide reasonable accommodations and protective measures to victims of dating violence, domestic violence, sexual assault, or stalking when requested and reasonably available, regardless of whether the victim chooses to report the incident to local law enforcement. Accommodations and protective measures may include changes to academic schedules, work assignments, campus access arrangements, security escorts, no-contact directives, and other measures designed to protect the safety and well-being of the victim.

Requests for accommodations or protective measures may be made through the Facilities & Safety Department, Title IX Coordinator, or another appropriate school official. PTI will maintain the confidentiality of accommodations and protective measures to the extent that doing so does not impair the institution's ability to provide them

Victims must notify the Facilities & Safety Department, 509.895.5898 of granted protection orders to allow the institution to comply. PTI may enforce an internal no-contact order or arrange for a security escort in an effort to protect a victim or witness when necessary, or when requested by the victim and reasonably available, regardless of whether the victim chooses to report the crime to local law enforcement.

Disciplinary Procedures
Perry Technical Institute provides a prompt, fair, and impartial investigation and resolution process for reports of dating violence, domestic violence, sexual assault, and stalking. Allegations are addressed through the Institute's Title IX grievance procedures. Both the complainant and respondent have the opportunity to present witnesses and evidence and may be accompanied by an advisor of their choice throughout the process. Following an investigation and review of the available information, the Institute will determine whether a violation of Institute policy occurred. Both parties will receive simultaneous written notification of the outcome of the proceedings, any disciplinary sanctions imposed, available remedies, and appeal procedures. Additional information regarding the Institute's grievance process may be found in the Institute's Title IX Sexual Harassment Policy and Procedures.

Available Support Programs
If you are sexually assaulted, resources are available on and off campus to help you. Talking with an advocate or a counselor is crucial to help explain your options, give you information, and provide emotional support. In addition to talking with a Campus Security Authority, other resource options include:

Perry Technical Institute

Facilities & Safety Department	509.895.5898

Emotional Care

Comprehensive Healthcare	509.575.4084
Aspen Victim Advocacy Services Hotline	509.452.9675
Lower Valley Crisis and Support Center Hotline	509.837.6689

Neighborhood Health Services	509.454.4143
Rape Crisis and Victim Services Hotline	817.927.2737
YWCA – Domestic Violence Support and Shelter	509.248.7796
Yakima County Sexual Assault Resource Center 24-Hour Line	509.575.4084
Suicide and Crisis Lifeline	988

Medical Care

MultiCare Yakima Memorial Hospital	509.575.8000
Planned Parenthood	866.904.7721

Registered Sex Offenders

Information about registered sex offenders in Yakima County can be obtained by accessing this website: http://www.icrimewatch.net/index.php?AgencyID=54495. Information is searchable by area, first and last name, city, or by non-compliant offenders.

Campus Crime Statistics

Classifying and Disclosing Crimes:
PTI discloses campus crime statistics, gathered by the Facilities & Safety Department, from Campus Security Authorities and local law enforcement. The statistics are broken down geographically into "on-campus", "public property" such as public streets and sidewalks, or “non-campus”. PTI does not own student housing facilities. The report also indicates whether any of the reported incidents, or any other crime involving bodily injury, was a "hate crime."

In some cases an incident that is reported as a crime may not be included in the Annual Security Report. The following standards must be met for an incident to be included.

1. **Reported to the Proper Authorities:** Incidents must be reported to law enforcement, Campus Security, or a Campus Security Authority (CSA). A person designated as a CSA does not mean a person employed by the Campus Security Department. A CSA can be any campus employee who a student reasonably believes that he or she can report a crime to and expect that the matter will be addressed.

2. **Qualifying Crimes:** The crime must be one of those listed as a Clery Act criminal offense, VAWA offense, Hazing offense, arrest or disciplinary referral, or reportable hate crime.

   Criminal Offenses
   - Murder / Non-negligent Manslaughter
   - Manslaughter by Negligence
   - Rape
   - Fondling
   - Incest
   - Statutory Rape
   - Robbery
   - Aggravated Assault
   - Burglary
   - Motor Vehicle Theft
   - Arson

   Arrests or Disciplinary Referrals
   - Liquor Law Violations
   - Drug Law Violations
   - Illegal Weapons Possession

   Violence Against Women Act (VAWA) Crimes
   - Domestic Violence
   - Dating Violence
   - Stalking

Hazing

Hate Crimes: Evidence that shows the victim was intentionally selected because of the victim's actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability. If any of the following crimes occur due to bias, it will be counted as a Hate Crime.

Larceny/Theft
Simple Assault
Intimidation
Destruction, Damage, or Vandalism of Property
Hazing

3. **Reportable Area:** The crime must have occurred in one of the reportable areas. Every reportable crime occurring within the boundaries of campus is considered as the reportable area. The two remaining areas are more difficult to define. Perimeter streets are described in the following way: "Sidewalk – Street – Sidewalk." This means that a reportable crime occurring on the sidewalks on either side of a perimeter street is reportable, as are incidents occurring in the street. But an incident occurring in a building (a privately owned store) on the distant side of a perimeter street would not be included. With regard to non-campus buildings, crimes occurring in those buildings or on the property of that location are reportable. Incidents occurring on the sidewalk or on the streets in front of that building are not Clery Act reportable.

   On-Campus: Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and

   Any building or property that is within or reasonably contiguous to the area identified in the aforementioned paragraph of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

   Non-campus: Any building or property owned or controlled by a student organization that is officially recognized by the institution; or

   Any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

   Public Property: Any thoroughfares, streets, sidewalks parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

4. **Made in Good Faith:** For an incident to be included there must be a determination that the report is made in good faith. Supporting evidence makes this determination simple, but such evidence is not always available. In such a case, the creditability of the person making the report is

considered. When the incident is reported to us through a law enforcement agency, we assume that this determination has already been made. If law enforcement determines that a particular reported incident could not have occurred or did not occur, i.e., a false report, then the crime is not included in the Annual Security Report. Only law enforcement can rule a crime as "unfounded."

APPENDIX A

CRIMINAL OFFENSES:	2023			2024			2025		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
MURDER / NON-NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
MANSLAUGHTER BY NEGLIGENCE	0	0	0	0	0	0	0	0	0
RAPE	0	0	0	0	0	0	0	0	0
FONDLING	0	0	0	0	0	0	0	0	0
INCEST	0	0	0	0	0	0	0	0	0
STATUTORY RAPE	0	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0	0

ARRESTS AND DISCIPLINARY REFERRALS:	2023			2024			2025		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
ARRESTS:									
LIQUOR LAW VIOLATIONS	0	0	0	0	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0	0	0	0	0
DISCIPLINARY REFERRALS:									
LIQUOR LAW VIOLATIONS	0	0	0	0	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0	0	0	0	0

VAWA CRIMES:	2023			2024			2025		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
DOMESTIC VIOLENCE	0	0	0	0	0	0	0	0	0
DATING VIOLENCE	0	0	0	0	0	0	0	0	0
STALKING	0	0	0	1	0	0	1	0	0

HAZING:	2023			2024			2025		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
HAZING	*	*	*	*	*	*	0	0	0

CAMPUS CRIME STATISTICS

	2023			2024			2025		
HATE CRIMES:	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
MURDER / NON-NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0	0
SEXUAL ASSAULT	0	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0	0
LARCENY / THEFT	0	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0	0
DESTRUCTION / DAMAGE / VANDALISM OF PROPERTY	0	0	0	0	0	0	0	0	0
HAZING	*	*	*	*	*	*	0	0	0

*Hazing was not a reportable Clery Act crime category for calendar years 2023 and 2024. The Stop Campus Hazing Act, which amended the Clery Act to require the collection and reporting of hazing statistics, was signed into law on December 23, 2024. Institutions began collecting hazing statistics on January 1, 2025. As a result, no hazing statistics were collected or reported for 2023 or 2024.

Zero crimes have been classified as a hate crime during the 2023 -2025 calendar years. Should a hate crime occur, it will be indicated in the Hate Crimes chart and described in a narrative categorized by the following bias; *race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability.*

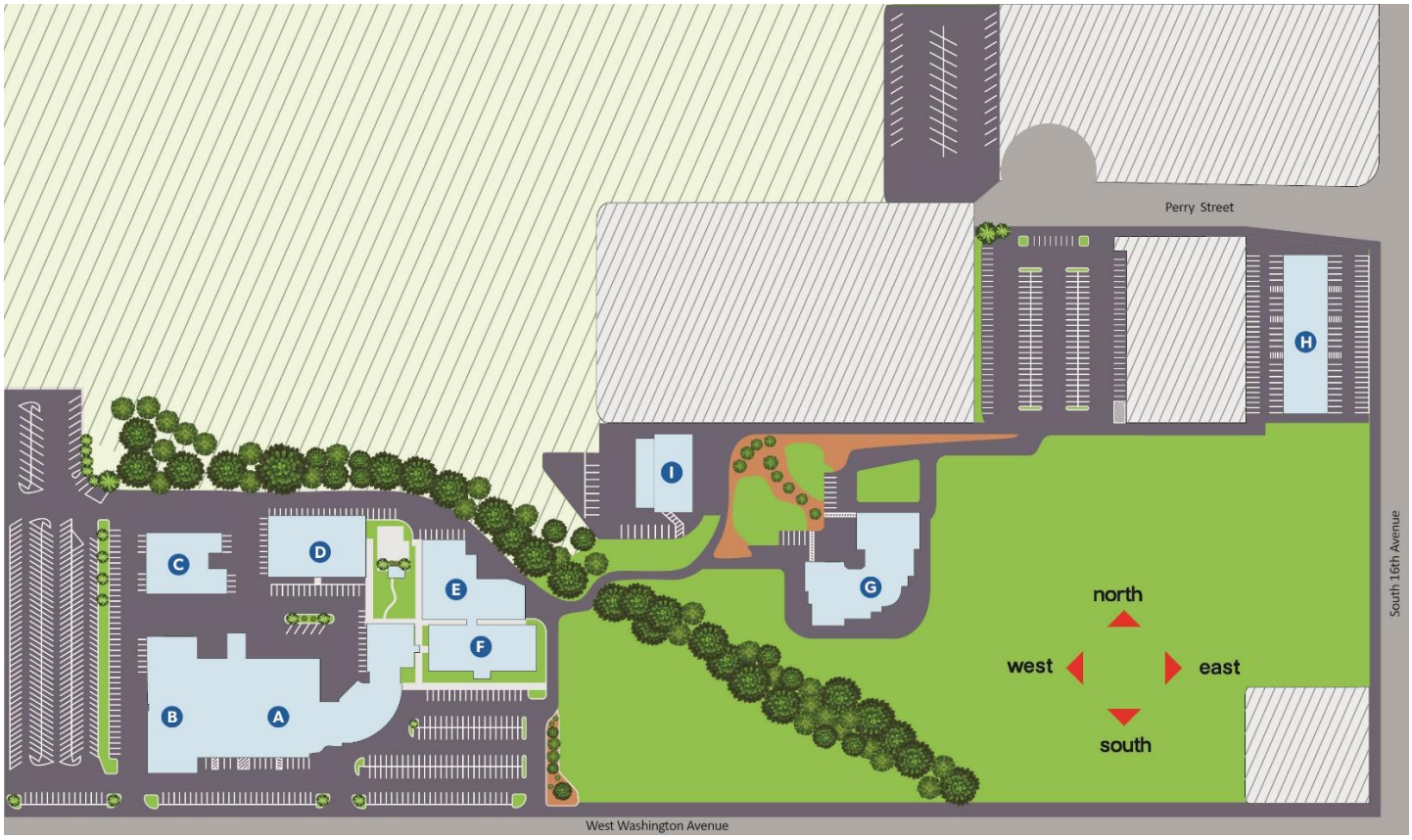
Perry Technical Institute does not own student housing facilities.

Zero crime reports were considered “unfounded” by authorities; therefore, zero reports were withheld from the crime statistics.

Hierarchy Rule
When examining incidents to determine if they should be included in the Annual Security Report, a portion of the Clery Act called the Hierarchy Rule comes into effect. Occasionally, a person who is arrested may have committed more than a single offense. The Hierarchy Rule requires in this situation that the college count the offense, which is the most serious in nature, and not count the offense of lesser significance. For example, if a person committed a burglary and a murder during a single act then only the murder would be counted. An exception to this rule exists for hate crimes. If a person commits a hate crime, then both crimes are counted.

APPENDIX B

PERRY TECH – YAKIMA CAMPUS MAP



ON-CAMPUS: All property shown, except for the public sidewalks and streets, are considered on-campus. Please see the following addresses for on-campus property:

- 2011 W. Washington Ave, Yakima, WA 98903
- 1612 Perry Street, Yakima, WA 98902
- 1620 Perry Street, Yakima, WA 98902
- 1712-1718 South 16th Ave, Yakima, WA 98902
- 1802 Tahoma Ave, Yakima, WA 98902

PUBLIC PROPERTY: *(Sidewalk – Street – Sidewalk)* Includes W. Washington Avenue, S. 16th Avenue, and Perry Street.

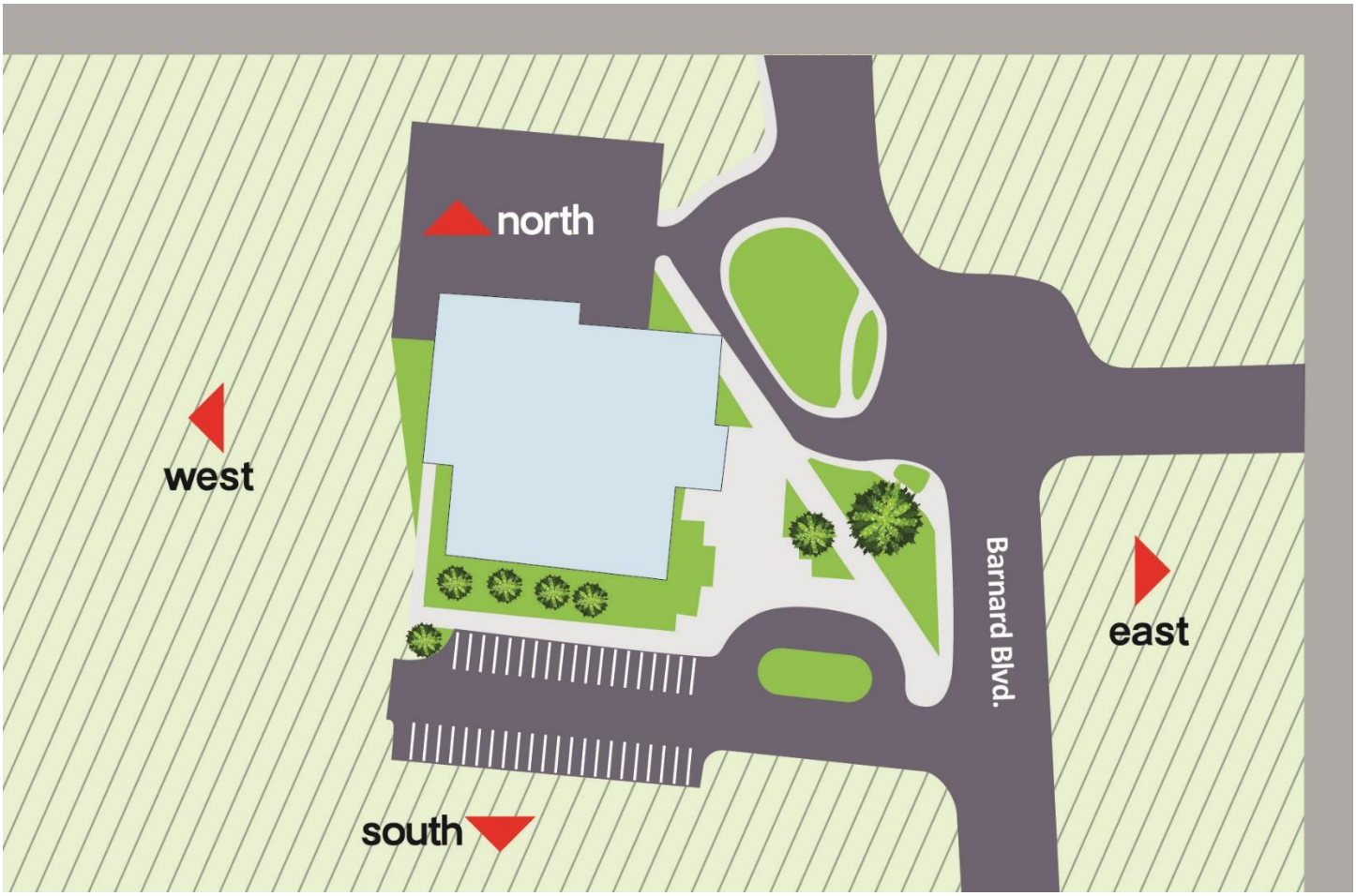
NON-CAMPUS: Please see the following address for non-campus property:

- 4603 Larch Ave., Yakima WA 98903
- 1301 S Fair Ave., Yakima, WA 98901
- 7004 Vista Ridge Ave., Yakima, WA 98908

STUDENT HOUSING FACILITIES: PTI does not own any student housing facilities.

APPENDIX C

PERRY TECH – SUNNYSIDE CAMPUS MAP



ON-CAMPUS: All property shown, except for the public sidewalks and streets, are considered on-campus. Please see the following address for on-campus property:

- 437 Barnard Blvd, Sunnyside, WA 98944

PUBLIC PROPERTY: *(Sidewalk – Street – Sidewalk)* Includes Barnard Blvd.

STUDENT HOUSING FACILITIES: PTI does not own any student housing facilities.

Perry Technical Institute's

Title IX Sexual Harassment Policy & Procedure

Pursuant to 34 CFR Part 106

Effective Date: September 22, 2026

Version 1.0

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Perry Technical Institute

Title IX Non-Discrimination & Grievance Process Policy

I. Introduction and Overview of Title IX Provisions

Non-Discrimination Policy

Title IX of the Education Amendments Act of 1972 prohibits discrimination on the basis of sex in any education program or activity operated by a recipient that receives federal financial assistance. As an educational institution subject to Title IX, Perry Technical Institute ("PTI")[1] has adopted this Title IX Non-Discrimination and Grievance Process Policy. As set forth in detail herein, PTI:

- Does not discriminate on the basis of sex, including in admissions and employment, and is committed to providing an educational and workplace environment that is free from sex-based discrimination, harassment, and retaliation;
- Prohibits discrimination on the basis of sex in its educational programs and activities, as required by law;
- Is committed to promoting fairness and equity in all aspects its operations; and
- Values and promotes the equal dignity of all community members and is committed to the pursuit of just resolutions with respect the rights of all parties involved.

This Non-Discrimination & Grievance Process Policy is adopted to prevent discrimination prohibited under Title IX and provide a prompt, fair, and impartial process to address complaints of alleged discrimination based on sex.

Inquiries about this policy or the application of Title IX may be referred to PTI's Title IX Coordinator, to the Assistant Secretary of the Department of Education's Office for Civil Rights, or both.

Designation of Title IX Coordinator

PTI's Title IX Coordinator oversees implementation and enforcement of this Policy, which includes primary responsibility for coordinating the school's efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy. The school's Title IX Coordinator is identified below and may be contacted with any questions about this policy, to file a report or formal complaint, or to otherwise assist individuals in ensuring equal access to the school's educational programs or activities.

[1] Perry Technical Institute or PTI, may be referred to interchangeably as the "School," the "Institution," or the "Recipient" throughout this document.

Andy Frank
Title IX Coordinator
2011 W Washington Ave
Yakima, WA 98903
(509) 453-0374
Email: TitleIX@perrytech.edu
Web: https://www.perrytech.edu/students/resources/safety/titleix/

Jennifer Snellink
Deputy Title IX Coordinator
2011 W Washington Ave
Yakima, WA 98903
(509) 453-0374
Email: TitleIX@perrytech.edu
Web: https://www.perrytech.edu/students/resources/safety/titleix/

To raise any concern involving bias, conflict of interest, sexual harassment, or retaliation by the Title IX Coordinator, contact PTI's President:

Jason Lamiquiz
President
2011 W. Washington Ave.
Yakima, WA 98902
(509)453-0374
Jason.lamiquiz@perrytech.edu

Office for Civil Rights Contact Information

Individuals may also contact the U.S. Department of Education's Office for Civil Rights with questions about Title IX. (*Please note that inquiries to OCR alone are not sufficient to allow appropriate responsive action by the school. To ensure your concern is appropriately addressed under this policy, please file a report with the school's Title IX Coordinator).*

Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-1100
Customer Service Hotline #: (800) 421-3481
Facsimile: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: http://www.ed.gov/ocr

The School's Mandatory Response Obligations

PTI's obligations under this policy are triggered when PTI has Actual Knowledge of conduct which may constitute sexual discrimination, harassment or retaliation as defined herein. Actual Knowledge by the school occurs when the Title IX Coordinator or an official of the school with authority to implement corrective measures ("OWA")[2] become aware of the occurrence of such potential conduct. Additionally, the school expects all regular employees to promptly report known or suspected violations of this policy to the Title IX Coordinator or Deputy Coordinator.

How to Make a Report or Formal Complaint of an Alleged Title IX Violation

Any person may report sex discrimination, sexual harassment, or retaliation to the Title IX Coordinator, whether or not that person is the person alleged to be the victim of such conduct. A report may be made in writing or verbally at any time, including during non-business hours. A report is differentiated from a Formal Complaint ("complaint") which is a document filed/signed by the Complainant or signed by the Title IX Coordinator alleging sexual harassment and requesting that the school investigate the allegation(s) and implement the institution's formal Grievance Process.

A report or complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail, by using the contact information in the section immediately above.

II. Title IX Policy and Grievance Process: General Provisions

After Making a Report or Formal Complaint

Upon receipt of a report or complaint, the Title IX Coordinator will undertake a prompt initial assessment to determine appropriate next steps as required under this policy, to include making an initial threat assessment to ensure there is no immediate danger to complainant or the campus community, and if there is, to take appropriate action, which may include emergency removal of Respondent as described below.

The Coordinator will contact Complainant to discuss the availability of appropriate supportive measures which will be implemented with input from the Complainant irrespective of, and in addition to, any resolution process including the formal Grievance Process, and will notify complainant about the right to have an Advisor.

If the report has been made without filing a formal complaint, the Title IX Coordinator will review the allegations, and discuss options with the Complainant which include the option of proceeding with a formal complaint or not. If the Complainant does not want to proceed with a formal complaint, those wishes will be respected, unless circumstances present a threat of danger or

[2] The following have been identified and designated by the school as Officials with Authority to take correction action: Jason Lamiquiz, President and Nathan Hull, Vice President of Academic Affairs. Actual notice by any of these individuals will constitute actual notice upon which notice the school's mandatory response obligations will be triggered through the application of this policy.

ongoing harm to Complainant or the campus community, in which case, the Title IX Coordinator may initiate a complaint.

If the Complainant files a Formal Complaint, or one is initiated by the Title IX Coordinator, the matter will proceed as described under the Grievance Process.

After submission of a Formal Complaint and after notification of allegations to Respondent, both parties will be notified of the availability of informal resolution, as applicable. Both parties must voluntarily consent in writing to any informal resolution process and may withdraw at any time and resume the formal Grievance Process.

At all stages of the process, irrespective of any resolution or grievance process which may be implemented, responsive and reasonable supportive measures will be implemented to ensure continued access to the school's educational program or activities.

Emergency Removal of Respondent

The school reserves the right to remove a Respondent from its education program or activities on an emergency basis when the individual poses an immediate threat to the physical health or safety of any student or member of the campus community. The school will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. If an emergency removal is imposed the Respondent will be given notice of the removal and the option to meet with the Title IX Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified.

Administrative Leave of Employee Respondent

Respondents that are employees of the school may be placed on administrative leave during the pendency of a grievance process as determined by the school and the Title IX Coordinator.

Complainant's Decision to Pursue a Formal Complaint

If a Complainant does not wish for their name to be shared, does not wish for an investigation to take place, or does not want a formal complaint to be pursued, they may make such a request to the Title IX Coordinator, who will evaluate that request in light of the duty to ensure the safety of the campus and to comply with state and federal law. The Complainant's wishes will be respected unless the Coordinator determines that initiating a formal complaint against Complainant's wishes is not clearly unreasonable in light of the known circumstances. If the Coordinator initiates a formal complaint against the wishes of Complainant, the Complainant may have as much or as little involvement in the process as they wish. The Complainant retains all rights of a Complainant under this policy irrespective of their level of participation. Whether or not a formal complaint is filed, the school will offer supportive measures to ensure Complainant's continued access to the school's educational program and activities. If the Complainant elects not to file a Formal Complaint, they retain the right to do so later.

Dismissal of Formal Complaint

Mandatory Dismissal

The school must dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:

1) The conduct alleged in the formal complaint does not constitute sexual harassment as defined in this Policy; and/or
2) The conduct did not occur in an educational program or activity controlled by the school(including buildings or property controlled by recognized student organizations), and/or the school does not have control of the Respondent; and/or
3) The conduct did not occur against a person in the United States; and/or
4) At the time of filing a formal complaint, a complainant is not participating in or attempting to participate in the education program or activity of the school.

Discretionary Dismissal

The school may dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing:

1) A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein; or
2) The Respondent is no longer enrolled in or employed by the school; or
3) Specific circumstances prevent the school from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

Upon any dismissal, the school will promptly send written notice of the dismissal and its rationale simultaneously to the parties. This dismissal decision is appealable by any party under the procedures for appeal below.

Dismissed complaints may include conduct which could be considered a potential violation of the school's Conduct Standards and may be addressed through other applicable, non-Title IX conduct policies and procedures accordingly.

Consolidated Complaints

If a complaint involves one or more complainant and/or respondent and allegations arising out of the same set of circumstances, the school may elect to consolidate complaints.

Time Limits on Reporting

There is no time limitation on making a report or formal complaint. However, if the Respondent is no longer subject to the school's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible. Acting on reports

or complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

Anonymous Report or Complaint

If a Complainant makes a report anonymously, it will be investigated by the school to the extent possible, both to assess the underlying allegation(s) and to determine if supportive measures or remedies can be provided. Anonymous reports typically limit the school's ability to investigate and respond, depending on what information is shared. In some situations, the Title IX Coordinator may proceed with the issuance of a Formal Complaint even when the Complainant's report has been made anonymously.

Confidentiality

Every effort is made by the school to preserve the confidentiality of reports and formal complaints to the greatest extent possible, and the school will not share details of any reports or complaints made except to the extent necessary to effectuate this policy. The release and sharing of information may be necessary to implement effective supportive measures and will be required if a formal complaint is filed. The school will not share the identity of any individual who has made a report or complaint of sexual harassment, discrimination, or retaliation, any individual who has been reported to be the perpetrator of sex discrimination, or any witness, except as necessary to effectuate this policy and as permitted by the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232g; FERPA regulations, 34 CFR part 99, or as required under applicable law.

Certain professionals have a legal and/or ethical responsibility to maintain communications made in the scope of their professional roles in strict confidence[3]. Some of these roles include licensed professional counselors/mental health providers, licensed medical and health care providers, victim advocates, ordained/licensed clergy, licensed attorneys and rape crisis or domestic violence resources. Complainants or Respondents wishing to speak to someone confidentially are encouraged to seek out such resources. Communications with such professionals are considered legally privileged and cannot be revealed without a party's express written consent.

Supportive Measures

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the school's education program or activity, including measures designed to protect the safety of all parties or the school's educational environment, and/or deter harassment, discrimination, and/or retaliation.

The Title IX Coordinator promptly makes supportive measures available upon receipt of a report

[3] In highly limited circumstances, such as when presenting an immediate threat or danger to another, or when subject to a court order, confidential communications may be revealed without the consent of a party.

or a complaint alleging possible sexual harassment. At the time that supportive measures are offered, the school will inform the Complainant, in writing, that they may file a formal complaint with the school either at that time or in the future, if they have not done so already. The Title IX Coordinator works with the Complainant to ensure that their wishes are taken into account with respect to the supportive measures that are planned and implemented.

The school will maintain the confidentiality of the supportive measures to the greatest extent feasible, provided that confidentiality does not impair the school's ability to provide supportive measures or otherwise fulfill its obligations under this policy. The school will implement measures in a way that does not unreasonably burden the other party.

Supportive measures may include, but are not limited to, counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, referral to medical or healthcare services, referral to community-based services, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

Violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement.

The school encourages the reporting of misconduct and crimes by Complainants and witnesses. Sometimes, Complainants or witnesses are hesitant to report or participate in grievance processes because they fear that they themselves may be in violation of certain policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons.

It is in the best interests of the school community that Complainants choose to report misconduct to school officials, that witnesses come forward to share what they know, and that all parties be forthcoming during the process.

To encourage reporting and participation in the process, the school maintains a policy of offering parties and witnesses amnesty from minor policy violations – such as underage consumption of alcohol or the use of illicit drugs – related to the incident.

Amnesty does not apply to more serious allegations such as physical abuse of another or illicit drug distribution.

Right to an Advisor

The parties have the right to select an Advisor of their choice to accompany them to any or all meetings and interviews during the resolution process. There are no limits on who can serve as an advisor; it may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with them throughout the resolution process. Under Title IX, cross-examination is required during the hearing and must be conducted by the parties' Advisors. If a party selects an advisor of their choice, this advisor must perform cross-examination on their behalf during the hearing, as the parties are not permitted to directly cross-examine each

other or any witnesses. If a party does not have an Advisor, or the advisor does not appear for a hearing, the school will provide one for the limited purpose of conducting cross-examination on behalf of the party.

An Advisor who is also a witness to the allegations in the complaint creates potential for bias and conflict-of-interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-maker(s) and may, but will not necessarily, impact the Final Determination.

The school cannot guarantee equal Advisory rights, meaning that if one party selects an Advisor who is an attorney, but the other party does not or cannot afford an attorney, the school is not obligated to provide an attorney.

Conflict-of-Interest & Bias

Title IX Personnel are trained to ensure they have no conflict of interest and are not biased for or against any party in a specific case, or for or against Complainants and/or Respondents, generally. To raise any concern involving bias, conflict of interest or other misconduct by any Title IX Personnel contact the school's President, Jason Lamiquiz, (509)453-0374 or Jason.lamiquiz@perrytech.edu to report your concern.

Resolution Timeline

The school will make a good faith effort to complete the resolution process fairly and promptly. The duration of a matter that proceeds through the Formal Grievance Process is determined by many factors including, but not limited to, the cooperation and availability of the parties and witnesses, potential concurrent criminal investigations, and the school closures, among others. The school will avoid all undue delays within its control and will grant reasonable extensions of time, upon written request and showing of good cause, by a party. The school will provide the parties written notice of delays and/or extensions, including appeal, which can be extended as necessary for appropriate cause by the Title IX Coordinator, who will provide notice and rationale for any extensions or delays to the parties as appropriate, as well as an estimate of how much additional time will be needed to complete the process.

Notifications to Parties

All notifications to the parties noted herein will be made by made by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official institutional records, or emailed to the parties' school-issued email or otherwise approved account. Once mailed, e-mailed and/or received in-person, notice will be presumptively delivered.

Clery Act Reporting

Reports or complaints of sexual assault, domestic violence, dating violence, and/or stalking that pose a serious or continuing threat of bodily harm or danger to members of the campus community may trigger a timely warning obligation by the school under the Clery Act. If a warning is deemed

necessary, the school will ensure that a Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the potential danger.

In addition, the school is obligated to report and disclose crimes under the Clery Act, including the crimes of sexual assault, domestic violence, dating violence and stalking as defined in this policy, for statistical reporting purposes only. Reports of these crimes do not include personally identifiable information and therefore preserves the confidentiality of any involved parties.

Retaliation

The school prohibits retaliation under this policy. Retaliation may include intimidating, threatening, coercing, harassing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by law or policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy and procedure. Alleged retaliation should be reported immediately to the Title IX Coordinator and will be promptly investigated. The school will take appropriate action to protect individuals who fear that they may be subjected to retaliation.

Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding under this policy and procedure does not constitute retaliation. Relatedly, a determination of responsibility, alone, is not sufficient to conclude that any party has made a materially false statement in bad faith.

III. Sexual Harassment Defined, Jurisdiction & Scope of Policy

Sexual Harassment Defined

For purposes of this policy and grievance process, Sexual Harassment has the meaning set forth below. Sexual harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, gender and/or gender identity of those involved.

Sexual Harassment means:

Conduct on the basis of sex that satisfies one or more of the following:

1) Quid Pro Quo:
    a. an employee of the school,
    b. conditions the provision of an aid, benefit, or service of the school,
    c. on an individual's participation in unwelcome sexual conduct; and/or

2) Sexual Harassment:
    a. unwelcome conduct,
    b. determined by a reasonable person,
    c. to be so severe, and
    d. pervasive, and,

e. objectively offensive,
f. that it effectively denies a person equal access to the school's education program or activity.

3) Sexual assault, defined as:

a. Sex Offenses, Forcible:
   i) Any sexual act directed against another person,
   ii) without the consent of the Complainant,
   iii) including instances in which the Complainant is incapable of giving consent.

b. Forcible Rape:
   i) Penetration,
   ii) no matter how slight,
   iii) of the vagina or anus with any body part or object, or
   iv) oral penetration by a sex organ of another person,
   v) without the consent of the Complainant.

c. Forcible Sodomy:
   i) Oral or anal sexual intercourse with another person,
   ii) forcibly,
   iii) and/or against that person's will (non-consensually), or
   iv) not forcibly or against the person's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

d. Sexual Assault with an Object:
   i) The use of an object or instrument to penetrate,
   ii) however slightly,
   iii) the genital or anal opening of the body of another person,
   iv) forcibly,
   v) and/or against that person's will (non-consensually),
   vi) or not forcibly or against the person's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

e. Criminal Sexual Contact[4]:
   i) The intentional touching of the clothed or unclothed body parts OR
   ii) The forced touching by the victim of the actor's clothed or unclothed body parts
   iii) For the purpose of sexual degradation, sexual gratification, or sexual humiliation
   iv) Without consent of the victim

[4] Previously referred to as "Fondling" under the FBI's Uniform Crime Reporting system.

v) Including instances where the victim is incapable of giving consent because of age or incapacity due to temporary or permanent mental or physical impairment or intoxication

f. Sex Offenses, Non-forcible:
   i) Incest:
      1) Non-forcible sexual intercourse,
      2) between persons who are related to each other,
      3) within the degrees wherein marriage is prohibited by Washington state law.

   ii) Statutory Rape:
      1) Non-forcible sexual intercourse,
      2) with a person who is under the statutory age of consent of as defined under Washington state law.

4) Dating Violence, defined as:
   a. violence,
   b. on the basis of sex,
   c. committed by a person,
   d. who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.
      i. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition—
      ii. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
      iii. Dating violence does not include acts covered under the definition of domestic violence.

5) Domestic Violence, defined as:
   a. violence,
   b. on the basis of sex,
   c. committed by a current or former spouse or intimate partner of the Complainant,
   d. by a person with whom the Complainant shares a child in common, or
   e. by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner, or
   f. by a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Washington state or
   g. by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Washington state.

*To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.

6) Stalking, defined as:
    a. engaging in a course of conduct,
    b. on the basis of sex,
    c. directed at a specific person, that
        i. would cause a reasonable person to fear for the person's safety, or
        ii. the safety of others; or
        iii. Suffer substantial emotional distress.

    For the purposes of this definition—

    (i) Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent 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.

    (ii) Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

    (iii) Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

Force, Coercion, Consent, and Incapacitation

As used in the offenses above, the following definitions and meanings apply:

Force: Force is the use of physical violence and/or physical imposition to gain sexual access. Force also includes threats, intimidation (implied threats), and coercion that is intended to overcome resistance or produce consent.

Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Silence or the absence of resistance alone is not consent. Consent is not demonstrated by the absence of resistance. While resistance is not required or necessary, it is a clear demonstration of non-consent.

Coercion: Coercion is unreasonable pressure for sexual activity. Coercive conduct differs from seductive conduct based on factors such as the type and/or extent of the pressure used to obtain consent. When someone makes clear that they do not want to engage in certain sexual activity, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.

Consent: Consent is knowing permission to engage in sexual activity that is voluntarily given through clear verbal communication or by unambiguous behavior.

Since individuals may experience the same interaction in different ways, it is the responsibility of each party to determine that the other has consented before engaging in the activity.

If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

For consent to be valid, there must be a clear expression in words or actions that the other individual consented to that specific sexual conduct. Reasonable reciprocation can be implied. For example, if someone kisses you, you can kiss them back (if you want to) without the need to explicitly obtain *their* consent to being kissed back.

Consent is revocable, as long as the withdrawal is reasonably and clearly communicated. If consent is withdrawn, that sexual activity should cease within a reasonable time.

Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). A current or previous intimate relationship is not solely sufficient to constitute consent.

Proof of consent or non-consent is not a burden placed on either party involved in an incident. Instead, the burden remains on the school to determine whether its policy has been violated. The existence of consent is based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred and any similar, previous patterns that may be evidenced.

Incapacitation: A person cannot consent if they are unable to understand what is happening or is disoriented, helpless, asleep, or unconscious, for any reason, including by alcohol or drugs. A Respondent violates this policy if they engage in sexual activity with someone who is incapable of giving consent due to incapacitation.

Incapacitation occurs when someone cannot make rational, reasonable decisions because they lack the capacity to give knowing/informed consent (e.g., to understand the "who, what, when, where, why, or how" of their sexual interaction) and is determined through consideration of all relevant indicators of an individual's state. Incapacitation is not synonymous with intoxication, impairment and/or being drunk. This policy also covers a person whose incapacity results from a temporary or permanent physical or mental health condition, involuntary physical restraint, and/or the consumption of incapacitating drugs.

It is a defense to a sexual assault policy violation that the Respondent neither knew nor should have known the Complainant to be physically or mentally incapacitated. "Should have known" is an objective, reasonable person standard which assumes that a reasonable person is both sober and exercising sound judgment.

Jurisdiction of the School

If the Respondent is unknown or is not a member of the school community, the school lacks the ability or the jurisdiction, respectively, to implement the Grievance Process. Any vendor serving the school through third-party contracts are subject to the policies and procedures of their employers, or if applicable, to these policies and procedures to which their employer has agreed to be bound.

Even when the school lacks the ability, or jurisdiction, to address allegations of sexual harassment, supportive measures, remedies, and resources may be accessible to the Complainant by contacting the Title IX Coordinator. When criminal conduct is alleged, the school will assist Complainant in contacting local or campus law enforcement to file a police report if requested. In addition, the school may take other actions as appropriate to protect the Complainant against third parties, such as barring individuals from school property and/or events.

Scope of the School's Educational Program and Activities

For purposes of this policy, the school's educational program or activities includes locations, events, or circumstances, within the U.S., where the school exercises substantial control over both the Respondent and the context in which the alleged sexual harassment or discrimination occurs and also includes any building owned or controlled by the school or by a student organization that is officially recognized by the school. It also includes online, and cyber manifestations of conduct prohibited by this policy, when those behaviors occur in or have an effect on the school's education program and activities or use the school networks, technology, or equipment.

IV. Formal Grievance Process

If a Formal Complaint is filed, the matter will proceed through the Grievance Process as outlined below and will include an objective investigation, live hearing with opportunity for cross-examination and the right to appeal. This process will treat complainants and respondents equitably. Any provisions, rule or practice adopted by the school as part of the grievance process, other than those required under Title IX and its implementing regulations will apply equally to both parties. The process will include an objective evaluation of all relevant evidence (inculpatory and exculpatory), will be conducted by trained Title IX Personnel, free from any known conflict of interest or bias, and presumes Respondent's non-responsibility until and unless demonstrated otherwise by the evidence and after a Final Determination has been rendered. Disciplinary sanctions or punitive measures will not be imposed against a respondent unless and until there has been a finding of responsibility after application of the process. If at any stage of the investigation it is determined that conditions exist warranting dismissal, the complaint will be dismissed. Complainant will continue to be entitled to appropriate supportive measures in such cases.

The school requires impartiality in the process by ensuring there are no actual or apparent conflicts of interest or disqualifying biases of any Title IX Personnel. The parties may, at any time during the resolution process, raise a concern regarding bias, conflict of interest, or any irregularity which may taint the impartiality of the process. Such concerns should be reported in writing to the Title IX Coordinator, or President, who will evaluate the concern and take appropriate corrective action to ensure integrity of the process.

Notice of Allegations

The Title IX Coordinator will provide written notice of the allegations to the respondent and complainant upon receipt of a Formal Complaint. The notice will be provided prior to any initial meeting or interview with the respondent and their Advisor, if applicable, allowing sufficient advanced notice to prepare.

The notice will include:

- A meaningful summary of all allegations,
- The identity of the parties (if known),
- The precise misconduct being alleged,
- The date and location of the alleged incident(s) (if known),
- The specific policies alleged to have been violated,
- A description of the applicable procedures,
- A statement of the potential sanctions/responsive actions that could result,
- A statement that Respondent is presumed not responsible for the reported misconduct unless and until a Final Determination has been rendered at the conclusion of the process,
- Notice that the parties will be given an opportunity to inspect and review all directly related and relevant evidence obtained during the investigation,
- The school's policy on retaliation,
- Information about the privacy of the process,
- The right to have an advisor of their choice, who may be, but is not required to be, an attorney,
- A statement informing the parties that the school's policy prohibits knowingly making false statements, including knowingly submitting false information during the resolution process,
- Detail on how the party may request disability accommodations during the interview process,
- The name(s) of the Investigator(s), along with a process to identify, in advance of the interview process, to the Title IX Coordinator any conflict of interest that the Investigator(s) may have, and
- An instruction to preserve any evidence that is directly related to the allegations.

Investigation

A trained investigator will be assigned to investigate allegations contained in a Formal Complaint and will do so objectively. The burden to collect all evidence related to the allegations, including both inculpatory and exculpatory, rests on the school, and not on the parties. Investigators must be free from bias and conflicts of interest. Depending on the complexity of the case, more than one Investigator may be assigned.

Investigation Timeline

The school will conduct the investigation in a reasonably prompt manner and will communicate

regularly with the parties to update them on the progress and timing of the investigation. The school may undertake a reasonable delay in its investigation under appropriate circumstances. Such circumstances include, but are not limited to, a concurrent law enforcement investigation, the need for language assistance, the absence of parties and/or witnesses, and/or accommodations for disabilities or health conditions. The school will communicate in writing the anticipated duration of the delay and reason to the parties and provide the parties with status updates as warranted. The school will promptly resume its investigation and resolution process as soon as feasible. During such a delay, the school will implement supportive measures as deemed appropriate.

Concurrent Law Enforcement Investigation or Criminal Proceedings

The school's grievance process is an administrative procedure required under Title IX to address sexual discrimination, and therefore is separate and independent of any law enforcement investigation or criminal proceedings. While a law enforcement investigation may necessitate a temporary delay in the school's grievance process, it does not replace it, as the school is legally obligated to address and remedy potential sexual harassment in its educational programs and activities as set forth in this policy.

Steps in the Investigation Process

All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses; obtaining available, relevant evidence. The school, not the parties, bears the burden of gathering evidence and burden of proof. Parties have equal opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record.

The Investigator(s) typically take(s) the following steps, if not already completed (not necessarily in this order):

- Commence a thorough, reliable, and impartial investigation by identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for all witnesses and the parties

- When participation of a party is expected, provide that party with written notice of the date, time, and location of the meeting, as well as the expected participants and purpose

- Interview all available, relevant witnesses and conduct follow-up interviews as necessary

- Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of the other party and witnesses, and document in the report which questions were asked, with a rationale for any changes or omissions

- Complete the investigation promptly and without unreasonable deviation from the intended timeline

- Provide regular status updates to the parties throughout the investigation

- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) with a list of witnesses whose information will be used to render a finding

- Draft an investigation report which fairly summarizes all relevant evidence and describes the procedural steps taken during the investigation

- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) an electronic or hard copy of the draft investigation report as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation that is directly related to the reported misconduct, including evidence upon which the school does not intend to rely in reaching a determination, for a ten (10) business day review and comment period so that each party may meaningfully respond to the evidence

- The Investigator(s) may elect to respond in writing in the investigation report to the parties' submitted responses and/or to share the responses between the parties for additional responses

- The Investigator(s) will incorporate relevant elements of the parties' written responses into the final investigation report, include any additional relevant evidence, make any necessary revisions, and finalize the report. The Investigator(s) should document all rationales for any changes made after the review and comment period

- The Investigator will incorporate any relevant feedback, and the final report is then shared with all parties and their Advisors through electronic transmission or hard copy at least ten (10) business days prior to a hearing

False Allegations and Evidence

Making deliberately false and/or malicious accusations in bad faith, knowingly providing false evidence, tampering with or destroying evidence, or deliberately misleading an official conducting an investigation are policy violations subject to discipline.

Role and Participation of Witnesses in the Investigation

Witnesses who are employees of the school are expected to cooperate with and participate in the school's investigation and resolution process. Failure of such witnesses to cooperate with and/or participate in the investigation or resolution process constitutes a violation of policy and may warrant discipline.

Interviews may occur in-person or remotely. Skype, Zoom, FaceTime, WebEx, or similar

technologies may be used. The school will take appropriate steps to reasonably ensure the security/privacy of remote interviews.

Recording of Interviews

No unauthorized audio or video recording of any kind is permitted during investigation meetings. If Investigator(s) elect to audio and/or video record interviews, all involved parties must be made aware of and consent to audio and/or video recording.

Evidentiary Considerations in the Investigation

The investigation includes collection of all evidence directly related to the allegations, which is not otherwise privileged. Only evidence which is also deemed relevant is summarized in the investigative report which is considered by the Decision-Maker(s), in rendering a determination of responsibility. All parties are provided the opportunity to review all non-privileged evidence gathered during the investigation which is directly related to the allegations in the complaint, whether or not it is also included in the investigative report. All parties are also provided with a copy of the investigative report summarizing relevant evidence only.

Relevant evidence does not include evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such evidence is offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the evidence concerns specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Privileged evidence is likewise excluded from both the investigation, investigative report and hearing unless a party expressly waives this privilege in writing and consents to the release of this information during the grievance process.

Investigative Report

Upon conclusion of the investigation, the investigator will create an investigative report that fairly summarizes relevant evidence and, at least ten (10) days prior to a hearing, will send the report to each party and the party's advisor, if any, the investigative report in an electronic format or hard copy, for their review and written response.

The Hearing

Upon conclusion of the investigation and distribution of the investigative report to the parties, the matter will proceed to the hearing stage of the grievance process. The hearing will be offered live, in real-time and will include cross-examination. A Decision-maker(s) will be appointed to preside over the hearing, evaluate the evidence and make a determination as to each allegation in the complaint. The decision-maker will be trained, independent and neutral, and will not have had any previous involvement with the investigation. Investigators, Title IX Coordinator (or designee) or Advisors are prohibited from serving as Decision-makers.

The school reserves the right to adopt any hearing protocols, which will be applied and be made

available equally to both parties, to ensure the efficiency, order and decorum of the hearing process. Any such protocols will be provided in writing to the parties, witnesses and participating individuals at least ten (10) days prior to the scheduled hearing date.

The school may designate an administrative facilitator of the hearing, which may include the Title IX Coordinator, as long as they do not have a conflict of interest.

The school may conduct the hearing virtually at their discretion or upon request of a party. Request for remote participation by any party or witness should directed to the Title IX Coordinator made at least seven (7) business days prior to the hearing.

The decision-maker may question the parties and any witness prior to cross-examination by the parties' advisors.

Only relevant questions, testimony and evidence may be proffered at the hearing, and the decision-maker will make determinations as to relevancy of every question posed by an advisor during cross-examination before it is answered.

Privileged evidence or testimony, likewise, may not be proffered during the hearing, without a party's waiver and written consent allowing its consideration at the hearing.

Parties may not conduct cross-examination. Advisors only will conduct cross-exam on a party's behalf. Only relevant questions will be allowed.

Parties, advisors, witnesses, and all participating individuals are expected to behave respectfully during the hearing. Harassing, intimidating or disruptive behavior will not be tolerated, and the school reserves the right to exclude anyone from participation in the process that fails to comport themselves accordingly.

An audio or audiovisual recording, or transcript will be made of the hearing, and will be made available to the parties for inspection and review. No other recording of the hearing will be allowed.

Evidentiary Considerations in the Hearing

Only Relevant Evidence Allowed
Any evidence that the Decision-makerdetermines is relevant may be considered. Only evidence, which is directly related to the allegations, not subject to an enforceable legal privilege and not otherwise excludable as described here is considered relevant.

The hearing does not consider the following which are deemed not relevant: 1) incidents not directly related to the possible violation, unless they evidence a pattern; or 3) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with

respect to the Respondent and are offered to prove consent.

Privileged Evidence Must be Excluded
Evidence subject to any recognized legal privilege will not be allowed in the hearing without the prior written waiver of the privilege and consent for its consideration during the grievance process.

When a Party/Witness Refuses to Submit to Cross-Examination
If a party or witness does not attend the hearing or declines to participate in cross-examination, the Decision-maker may still consider any prior statements made by that individual in reaching a determination regarding responsibility. However, the weight and credibility of such statements will be evaluated in the context of all available evidence, including whether the opposing party had an opportunity to challenge the accuracy or context of the statement through other means. The Decision-maker(s) may not draw an adverse inference solely based on a party's or witness's absence or refusal to answer questions.

Final Determination as to Responsibility and Standard of Proof

Upon completion of the hearing, the decision-maker will deliberate privately and will render a finding as to each allegation in the complaint by applying the preponderance of the evidence standard; whether it is more likely than not that the Respondent violated the Policy as alleged. The decision will be provided simultaneously to the parties through the issuance of a written determination letter, delivered by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official school records, or emailed to the parties' school-issued email or otherwise approved account. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

The determination letter will include:
Identification of the allegations potentially constituting sexual harassment as defined under the policy;

A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits methods used to gather evidence, and hearing held;

Findings of fact supporting the determination;

Conclusions regarding application of the school's code of conduct to the facts;

A statement, and rationale for, the results as to each allegation, including a determination regarding responsibility, and disciplinary sanctions the school imposes on the respondent, and whether remedies designed to restore or preserve equal access to the schools' education program or activity will be provided by the school to the complainant; and

The school's permissible bases for the complainant and respondent to appeal.

The determination regarding responsibility becomes final after expiration or exhaustion of any appeal rights.

Sanctions, Disciplinary Action & Remedies

The school may consider a number of factors when determining a sanction and/or remedy and will focus primarily on actions aimed at ending, and preventing the recurrence of, discrimination, harassment, and/or retaliation and the need to remedy the effects its effects on the Complainant and campus community. Sanctions will be imposed upon either expiration of the appeal window, or after final determination on any appeal filed.

Sanctions or actions may include, but are not limited to, those listed below. These may be applied individually or in combination and the school may assign sanctions not listed, as deemed appropriate.

Applicable Student Sanctions may include but are not limited to the following:

- *Warning:* A formal statement that the conduct was unacceptable and a warning that further violation of any school policy, procedure, or directive will result in more severe sanctions/responsive actions.
- *Required Counseling:* A mandate to meet with and engage in either school-sponsored or external counseling to better comprehend the misconduct and its effects.
- *Probation:* A written reprimand for violation of institutional policy, providing for more severe disciplinary sanctions in the event that the student or organization is found in violation of any institutional policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- *Suspension:* Termination of student status for a definite period of time not to exceed two years and/or until specific criteria are met. Students who return from suspension are automatically placed on probation through the remainder of their tenure as a student at the school.
- *Expulsion:* Permanent termination of student status and revocation of rights to be on campus for any reason or to attend school-sponsored events.
- *Withholding Diploma*: The school may withhold a student's diploma for a specified period of time and/or deny a student participation in commencement activities if the student has an allegation pending or as a sanction if the student is found responsible for an alleged violation.
- *Other Actions:* In addition to or in place of the above sanctions/responsive actions, PTI may assign any other responsive actions as deemed appropriate.

Applicable Employee Sanctions may include but are not limited to the following:

- *Verbal or Written Warning*
- *Corrective Action Plan/Management Process*
- *Enhanced Supervision, Observation, or Review*

- *Required Counseling*
- *Required Training or Education*
- *Probation*
- *Denial of Pay Increase/Pay Grade*
- *Loss of Oversight or Supervisory Responsibility*
- *Demotion*
- *Transfer*
- *Reassignment*
- *Assignment to New Supervisor*
- *Restriction of Stipends and/or Professional Development Resources*
- *Suspension/Administrative Leave with Pay*
- *Suspension/Administrative Leave without Pay*
- *Termination*
- *Other Actions*: In addition to or in place of the above sanctions/responsive actions, PTI may assign any other responsive actions as deemed appropriate.

Long-Term Remedies/Other Actions

Following the conclusion of the resolution process, and in addition to any sanctions imposed, the Title IX Coordinator may implement additional long-term remedies or actions with respect to the parties and/or the campus community that are intended to stop the harassment, discrimination, and/or retaliation, remedy the effects, and prevent reoccurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Education to the individual and/or the community
- Alteration of work arrangements for employees
- Provision of campus safety escorts
- Climate surveys
- Policy modification
- Training or awareness campaigns
- Provision of transportation accommodations
- Implementation of long-term contact limitations between the parties
- Adjustments to academic deadlines, course schedules, etc.
- Modified campus security measures

At the discretion of the Title IX Coordinator, certain long-term support or measures may also be provided to the parties even if no policy violation is found.

The school will maintain the privacy of any long-term remedies/actions/measures, provided privacy does not impair the school's ability to provide these services.

Failure to Comply with Disciplinary Sanctions or other Remedies

Respondents are expected to comply with any disciplinary sanction or remedy as set forth in the Final Determination or in response to a final outcome. Failure to abide by the sanction(s)/action(s) whether by refusal, neglect, or any other reason, may result in additional disciplinary action, including suspension or expulsion.

Appeals

Any party may file an Appeal on the following grounds. Appeals must be submitted in writing to the Title IX Coordinator within seven (7) days of the delivery of the Notice of Outcome. After expiration of the appeal window, the determination will be considered final, and any applicable sanctions will be imposed.

Grounds for Appeal

Appeals may be made on the following bases:

1. Procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
3. The Title IX Coordinator, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter.

Any sanctions imposed as a result of the Final Determination are stayed during the appeal process.

Title IX personnel with prior involvement in the matter will not be permitted to serve as a decision-maker in the appeal. Appeals will not include a hearing. A decision on the merits will be based on information provided in the appeal document. If an appeal is based on the availability of new evidence, this evidence must be described with specificity and must be available for review within a reasonably prompt timeframe for consideration.

The appeal outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, and the rationale supporting the findings. Appeal decisions will be made within 14 business days, barring exigent circumstances, including the review of new evidence not immediately available for submission with the appeal request. Decisions on appeal will be made by applying the preponderance of evidence standard.

Notification of the appeal outcome will be made in writing and will be delivered simultaneously to the parties by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official institutional records, or emailed to the parties' school-issued email or otherwise approved account. Once mailed, e-mailed and/or received in-person, notice will be presumptively delivered. Decisions on appeal are considered final.

Record Retention

The school will maintain the following records related to the implementation of this policy for seven years:

1. Reports or Formal Complaints alleging sexual discrimination, including harassment.
2. Records of any dismissal of a Formal Complaint.
3. Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required under federal regulation;
4. Any disciplinary sanctions imposed on the Respondent;
5. Any remedies implemented by the school designed to restore or preserve equal access to the school's education program or activity;
6. Any appeal and the result therefrom;
7. Any Informal Resolution and the result therefrom;
8. All materials used to train Title IX Coordinators, Investigators, Decision-makers, and any person who facilitates an Informal Resolution process. The school will make these training materials publicly available on the school's website. (Note: If the school does not maintain a website, the school must make these materials available upon request for inspection by members of the public.); and
9. Any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, including:
    a. The basis for all conclusions that the response was not deliberately indifferent;
    b. Any measures designed to restore or preserve equal access to the school's education program or activity; and
    c. If no supportive measures were provided, document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

Revision of this Policy

This Policy and procedures supersede any previous policy(ies) addressing harassment, sexual misconduct, discrimination, and/or retaliation under Title IX and will be reviewed and updated subject to any relevant change in law or institutional policy, and on a recurring periodic basis, by the Title IX Coordinator. The school reserves the right to make changes to this document as necessary, which become effective when published.

This policy will not restrict any rights guaranteed against government action by the U.S. Constitution and should be interpreted accordingly and should also be construed to comply with the most recent government regulations or applicable judicial decisions.

This document does not create legally enforceable protections beyond the protection of the background state and federal laws which frame such policies and codes, generally.

This Policy and procedures are effective September 22, 2026.

V. Appendix A: Definitions

Actual Notice. Notice of sexual harassment or allegations of sexual harassment to the school's Title IX Coordinator or any official of the school who has the authority to institute corrective measures on behalf of the school. The school receives notice when an employee, student, or third-party informs the Title IX Coordinator or other Official with Authority of the alleged occurrence of harassing, discriminatory, and/or retaliatory conduct. Imputation of knowledge based solely on vicarious liability or constructive notice is insufficient to constitute actual knowledge.

Advisor. A person chosen by a party to accompany the party to meetings, interviews or hearings related to the resolution process, to advise the party on that process, and to conduct cross-examination for the party at the hearing. If a party does not have an advisor, the school will appoint one for the sole purpose of conducting cross-examination at the hearing.

Bias. Any preconceived belief about a party or witness to an allegation of sex discrimination which interferes with the objectivity of any Title IX personnel in fulfilling their responsibilities under this policy and Title IX.

Complainant. An individual who is alleged to be the victim of conduct that could constitute harassment, discrimination or retaliation under Title IX.

Confidential Resource. A person or entity identified by the school, with a professional obligation to protect and hold confidential any information shared from a complainant, respondent or witness.

Consolidated Complaint. A formal complaint with more than one Complainant or Respondent arising when multiple parties submit formal complaints arising out of the same facts and circumstances and as deemed appropriate for consolidation by the Title IX Coordinator.

Day. A day means a business day, or days in which the school is open for normal operations as published by the school, and excludes weekends, official holidays or other the school closures, planned or unplanned.

Deputy Title IX Coordinator. Any employee delegated with responsibility for compliance with Title IX and this policy by the Title IX Coordinator, and acting within the scope of authority of a Title IX Coordinator.

Education Program or Activity. Locations, events, or circumstances where the school exercises substantial control over both the Respondent and the context in which the alleged sexual harassment or discrimination occurs and also includes any building owned or controlled by the school or by a student organization that is officially recognized by the school.

Final Determination*:* A decision rendered and provided in writing to the parties of a Formal Complaint after application of the school's Grievance Process concluding whether or not Respondent is responsible for conduct alleged within a Formal Complaint in violation of The school' policy prohibiting discrimination and harassment on the basis of sex under Title IX. A

written Final Determination contains all information articulated in Title IX regulations and is provided simultaneously to both parties of a Title IX Grievance Process, including an Appeal.

***Finding**:* A conclusion within the Final Determination as evaluated under the Burden of Proof that a specific allegation within a Formal Complaint did or did not occur.

Formal Complaint. A document filed and signed by the Complainant or signed by the Title IX Coordinator alleging a policy violation by a Respondent and requesting that the school investigate the allegation(s).

Formal Grievance Process. The method of formal resolution designated by the school to address conduct that falls within the scope of this policy, and which complies with the requirements of 34 CFR Part 106.45.

Decision-maker(s). A trained individual with responsibility for making a Final Determination as set forth in the school' Formal Grievance Process. A Decision-maker must maintain neutrality and cannot perform the function of either the Title IX Coordinator or Investigator.

Informal Resolution Process. An alternative resolution process which may be available to the parties to seek Resolution of a Formal Complaint in lieu of the Formal Grievance Process. Informal resolution is facilitated by appropriately trained individuals, is made available at the discretion of the school and as deemed appropriate by the Title IX Coordinator, and offered only if informed, voluntary and written consent is made by all parties to a complaint. Any party may opt-out of the informal process at any time, and the matter will proceed through the Formal Grievance Process. Examples of informal resolution include, but are not limited to, mediation and restorative justice.

Investigator. A trained individual responsible for fulfilling the school's burden of gathering and evaluating all evidence related to allegations within a Formal Complaint as required under the school' Grievance Process.

Mandated Reporter. An employee of the school who is obligated by policy to share knowledge, notice, and/or reports of harassment, discrimination, and/or retaliation with the Title IX Coordinator.

Official with Authority. An employee of the school explicitly vested with the responsibility to implement corrective measures for Title IX harassment, discrimination, and/or retaliation on behalf of the school.

Parties. The Complainant(s) and Respondent(s), collectively.

Presumption of Non-Responsibility. Upon Actual Notice of an allegation of Sexual Harassment , there will be no prejudgment of the facts assuming or concluding that Respondent's conduct violated the school's policy until a Final Determination has been rendered after an objective and impartial application of the school's Formal Grievance Process.

Remedies. Post-Finding actions directed to the Complainant and/or the community implemented to address safety, prevent the recurrence of harassment, and ensure continued access to the school' educational program.

Respondent. An individual who has been reported to be the perpetrator of conduct that could constitute harassment, discrimination or retaliation under Title IX.

Resolution. A determination reached as a result of the Formal Grievance Process, including any Appeal or the decision rendered or agreement resulting from an Informal Resolution.

Sanction. A disciplinary consequence imposed by the school on a Respondent who is found to have violated this policy.

Sexual Harassment. Behavior or conduct as defined under Title IX and its implementing regulations at 34 CFR 106, and as more fully articulate in Section XXX of this policy.

Title IX Coordinator. The school's employee responsible for ensuring compliance with Title IX.

Title IX Personnel. Those individuals collectively tasked with implementation of the Title IX Policy and Grievance Process including specifically, the Title IX Coordinator (including any designees as applicable), any Investigator or any Decision-maker.