UNIVERSITY OF St.Thomas®

Annual Campus Security and Fire Safety Report

2026

This report is completed annually by the University of St. Thomas Department of Public Safety. We encourage members of the university community to utilize this report as a guide for safe practices on and off our campuses. The university sends out a mass notification over email and text message on an annual basis notifying all enrolled students and employees that the report is available to be reviewed.

For prospective students, members of the community, and others, the Annual Campus Security and Fire Safety report is available online at https://www.stthomas.edu/public-safety/crime-reporting/security-fire-safety-report/. Physical copies of this report are also available from the University of St. Thomas Department of Public Safety 2115 Summit Avenue, St. Paul, MN 55105. You may also request to have a copy mailed to you by calling (651)962-5100.

A Message from The University of St. Thomas Department of Public Safety:

At the University of St. Thomas, the safety and well-being of our students, faculty, staff, and visitors is our highest priority. We are committed to fostering a campus environment where every member of our community feels secure, supported, and empowered to thrive.

This Annual Security Report is part of that commitment. It provides important information about our safety policies, resources, and statistics in compliance with the Clery Act, and it reflects our dedication to transparency and accountability. Beyond meeting legal requirements, this report is a tool to keep our community informed and engaged in the shared responsibility of campus safety.

Public Safety works every day in partnership with students, staff, faculty, and our neighbors to prevent crime, respond quickly when issues arise, and provide resources that promote a safe and welcoming learning environment. We encourage you to familiarize yourself with the information in this report, use the safety resources available to you, and join us in sustaining a culture of care and responsibility.

Together, we can ensure the University of St. Thomas remains not only a place of academic excellence, but also one where safety and respect for all are fundamental.

Sincerely,
Zachary DuBois
Director, Department of Public Safety

DEPARTMENT OF PUBLIC SAFETY MISSION STATEMENT

The Department of Public Safety, in partnership with the campus community and within the framework of the university's mission, is dedicated to creating and promoting a safe, secure, and peaceful environment by applying policies and laws, delivering emergency services, performing requests for assistance, and providing on-going education.

The following are the Public Safety Department's guiding principles:

Respect: We will respect all people in all situations.

Integrity: We will maintain integrity in all that we do.

Impartial: We will be impartial in the delivery of services.

Information: We will provide clear, timely, and accurate information.

OVERVIEW OF THE DEPARTMENT OF PUBLIC SAFETY

The Department of Public Safety operates 24 hours a day, 7 days a week, and 365 days a year to assist the University of St. Thomas community by providing core services for some or all of the following:

- Protection of the university and its community from all manner of significant danger, injury, harm, or property damage
- Law and code enforcement services, including uniformed patrol and incident response, and crime prevention, suppression, and investigation
- Fire, rescue services, emergency medical services, and hazardous materials response
- Emergency communications and dispatch, including interfacing with public emergency communications telephone systems (9-1-1, E9-1-1)
- Emergency management services and crisis response during emergencies, disasters, and special events
- Security services, including alarm and video monitoring, access control, and lost and found services
- Parking management, enforcement, and transportation services
- Inspections, including building safety, lighting, site security surveys, etc.
- Animal control
- Unified command and liaison services with public agency counterparts, including the Federal Bureau of Investigations, The United States Department of Homeland Security, Federal Emergency Management Agency of the United States, The Minnesota Department of Public Safety and Bureau of Criminal Apprehension, the St. Paul and Minneapolis Police Departments, the Ramsey County and Hennepin County Sheriff's Offices, St. Paul and Minneapolis Fire Departments, etc.

How the Annual Security Report is Prepared

The following document is being submitted by the University of St. Thomas in compliance with 34CFR§ 668.46 and 34CFR§ 668.49. This report contains detailed information and documentation dealing with public safety services, crime prevention policies, and campus crime statistics for the 2024 calendar year.

The Department of Public Safety compiles all required information and statistics for this brochure.

Statistics are collected using Public Safety Initial Complaint Reports, and from other reporting authorities including but not limited to local law enforcement agencies and officials of the university who have significant responsibility for student and campus activities. These university officials, known as Campus Security Authorities, include individuals in departments such as Athletics, Dean of Students, and Residence Life offices.

Other required information included in the Annual Campus Security Act Report, including the University of St. Thomas security-related policies and procedures, are also compiled from various sources.

By October 1st of each calendar year, all current employees and students are electronically notified of the availability of this report and how to request a copy. This report is accessible on the Public Safety website at:

(http://www.stthomas.edu/publicsafety/prevention/campussecurityact/)

The report is also made available upon request at the Public Safety office located in Morrison Hall's main level on the northeast corner.

All reasonable attempts have been made to identify all reported criminal activity and to present the crime statistics in this report in accordance with the Campus Security Act and its amendments.

Where To Report A Crime

All faculty, staff, students, and visitors are encouraged to report all criminal activity, emergencies, or other public safety-related incidents occurring on and near University of St. Thomas property in an accurate, prompt, and timely manner. In some circumstances, reporting to university officials may be required under the university's Non-Discrimination and Anti-Harassment Policy, Sexual Misconduct Policy, and Reporting Suspected Child Abuse Policy.

All criminal activity, emergencies, or other public safety-related incidents reported to the Department of Public Safety will be investigated by Public Safety staff. Information regarding these

crimes and suspicious activity, including investigative follow-up, is also shared with the local police department when necessary.

Other emergencies reported to the Department of Public Safety will be investigated by Public Safety staff and/or referred to the proper department or agency for follow-up.

Accurate and prompt reporting ensures Public Safety can evaluate, consider and send timely warning reports, disclose crimes through ongoing disclosure processes such as the posting of crimes in the Daily Crime Log and accurately documenting reportable crimes in its annual statistical disclosure.

The University of St. Thomas further encourages accurate and prompt reporting to St. Paul Police Department (SPPD), Minneapolis Police Department (MPD), or the local police when the victim of a crime elects to or is unable to make such a report.

Local Law Enforcement Agencies can be reached for emergency and criminal related issues. Public Safety can assist in contacting non-local agencies when needed.

Department of Public Safety Contact Information and locations:

St. Paul Campus

Department of Public Safety Office: 2115 Summit Avenue, St. Paul, MN 55105. We are located on the ground level on Morrison Hall northeast corner. The Department of Public Safety office and dispatch center is open 24 hours a day, 7 days a week, 365 days a year.

Department of Public Safety:

EMERGENCY LINE: (651) 962-5555, or 5555 (on-campus phone)

Non-emergency: (651) 962-5100

St. Paul Police Department

Emergency - 911

Non-emergency - (651) 291-1111

Minneapolis Campus

Department of Public Safety:

EMERGENCY LINE: (651) 962-5555, or 5555 (on-campus phone)

Non-emergency: (651) 962-5100

Minneapolis Campus Locations: Please note that the Minneapolis Campus is only staffed by officers from 6:00am – 12:00 am (midnight).

Minneapolis Opus Hall (MOH): 2nd floor near the skyway.

Terrence Murphy Hall (TMH): 1st floor near the main entrance.

Minneapolis School of Law (MSL): 1st floor near the Elevators.

Minneapolis School of Law Skybox: 2nd floor near the skyway entrance to the Harmon Court Parking Ramp.

(The staffing of these desks depends on staffing levels, patrols, incidents and events; if no one is present contact Public Safety directly by phone at the numbers listed above.)

Minneapolis Police Department

Emergency - 911

Non-emergency - (612) 348-2345

Bernardi (Rome) Campus

The Department of Public Safety does not have security personnel on the Bernardi Campus, but the Bernardi Campus Director and the Facilities Manager can assist in making a report to the local police agency and Public Safety Department. (Contact: Bernardi Campus Director at (651) 962-6116) For emergency situations, residents may dial "9" from any phone in the residence to contact the front office. Front office hours vary, and they are posted on the front office door. In addition, only within the building and for emergencies only, residents can dial #002 it will ring directly to Director Thanos' cell or #001 Manager Remo's cell or non-emergencies by email tjzyngas@stthomas.edu, nunzioremo.difulvio@stthomasrome.it.

Rome Questra (Police):

Address: Via Ruffini, 1, 00195 Roma RM, Italy

Emergency - 112 (equivalent of US '911')

Non-emergency – 06-328-071

Fire – 115

Ambulance - 118

Report crime confidentially or anonymously

PSTIPS@stthomas.edu

(651) 962-TIPS.

For more information on the use of confidential reporting options, please refer to our website at:

http://www.stthomas.edu/publicsafety/reports/onlinereports/

Other University of St. Thomas departments that can receive reports:

Dean of Students: For student conduct related issues and/or student related concerns

- Located: Anderson Student Center (ASC) room 241
- Phone: (651) 962-6050 or 2-6050 (on campus phone)

Title IX Coordinator: For Title IX related issues and/or Bias Complaints

- Located: Anderson Student Center (ASC) room 241 and Aquinas Hall (AQU) room 217
- Phone: (651) 962-6882 or 2-6882 (on campus phone)

On-line and Anonymous Reports: https://stthomas-advocate.symplicity.com/titleix_report/

Human Resources: For employees conduct related issues and/or employee related concerns

- Located: Aquinas Hall (AQU) room 201
- Phone: (651) 962-6520 or 2-6520 (On campus phone)

Residence Life: For concerns involving resident students.

- Located: Koch Commons (KOC)room 106
- Phone: **(651) 962-6470 or 2-6470** (On campus phone)

Emergency Call Boxes

Emergency call boxes and general-use wall phones are also available to report crimes. They are found throughout the St. Paul and Minneapolis campuses in elevators, parking garages, and ramps, and in administrative, academic, and residence hall facilities. Also, there are emergency alarm buttons in designated administrative and academic offices.

Emergency call box phones located outdoors and marked with a blue light above them provide a direct link to the Public Safety emergency line. Officers will respond immediately to the activation of these emergency boxes.

The reporting of criminal or suspicious activity and campus emergencies to Public Safety allows the department to continually reassess services and develop better methods of crime prevention.

Reporting Crimes to Campus Security Authorities

The University of St. Thomas is required under federal law to report specific criminal offenses to the United States Department of Education.

Reportable Criminal Offenses and definitions

These criminal offenses are as follows:

Criminal Homicide: separated into two categories:

Murder and Non-negligent Manslaughter: defined as the willful (non-negligent) killing of one human being by another. Any death caused by injuries received in a fight, argument, quarrel, assault or the commission of a crime.

Manslaughter by Negligence: is defined as the killing of another person through gross negligence. In other words, it's something that a reasonable and prudent person would not do.

Sex Offenses, Rape, Fondling, Incest, Statutory, Sexual Assault. Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent.

Rape: is the penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

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

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

Statutory Rape: sexual intercourse with a person who is below the legal age of consent for such activity in the relevant jurisdiction

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

Aggravated Assault: is an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm

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

Motor Vehicle Theft: is the theft or attempted theft of a motor vehicle.

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

Hate Crimes: is a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim.

Stalking: is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- fear for the person's safety or the safety of others; or
- suffers substantial emotional distress.

Domestic Violence: is defined as a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; a person with whom the victim shares a child in

common; a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred. To categorize an incident as Domestic Violence, the relationship between the perpetrator and the victim must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship

Dating Violence: is defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

Liquor Law Violations: are defined as the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Drug Law Violations: are defined as the violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

Weapon violations: are defined as the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

Reportable Geography

The Department of Public Safety coordinates this effort for the university by compiling relevant data for crimes occurring in the following places:

- On-campus
- On public property immediately adjacent to and accessible from the campus.
- Noncampus property, in accordance with the Clery Act definition.
- Public Safety regularly checks with other university departments to capture any possible noncampus properties.
- Public Safety also monitors the travel registry for university sponsored travel, and request crime statistics for any locations that meet the definition of noncampus property.

The above-noted crimes within these geographic locations are statistically counted if they are reported to local police agencies, the Department of Public Safety, or a Campus Security Authority.

Definition of Campus Security Authority

The Department of Education defines a Campus Security Authority as "Any official of the university who has significant responsibility for students and campus activities." Students, employees, and other members of the university community should report any of the criminal offenses above for the purpose of making a timely warning and the annual statistical disclosure.

Examples of Campus Security Authorities include but are not limited to:

- The Dean of Students
- The Athletics Director
- Team coaches
- Faculty advisors to student groups

A faculty member *is not* considered a Campus Security Authority unless he or she serves as an advisor to a student group or has other significant responsibility for student and campus activity beyond the classroom.

Where a Campus Security Authority Should Report

If Campus Security Authorities have information regarding the above-cited crimes, they must forward that information to the Public Safety contact below for reporting purposes.

The following forms should be used to report incidents as outlined above (one incident per form). If you have difficulty opening these attachments, please call the Public Safety contact below.

- Crime Statistic Report Form

Note: The Campus Security Authorities are told it is important that an exact date and location of the incident be included in the report. In addition, please provide a brief description of the incident so that crimes can be appropriately classified in accordance with the crime definitions published under the Federal Bureau of Investigation's Uniform Crime Reporting program.

If they have questions regarding this request, or if they would like to discuss a specific incident, please call the Public Safety contact below.

Please return completed forms in a "Confidential" envelope to:

Aaron Fimon

St. Paul Campus and Clery Compliance Manager

Department of Public Safety

University of St. Thomas

2115 Summit Avenue Mail #4081

St. Paul, MN 55105-1096

(651) 962-5189 Office

(651) 962-5110 Fax

Security Measures

Public Safety has surveillance camera systems installed throughout the St. Paul campus including in residence halls, parking lots, ramps, and other key interior and exterior areas. At the Minneapolis Campus, these systems are also operational in all campus buildings and some exterior areas.

These camera systems are monitored 24 hours a day and continuously record to digital media. The use of these camera systems, coupled with 24-hour monitoring and recording, enhances community safety and security while aiding in the investigation of criminal and suspicious incidents on campus.

Both campuses also utilize an electronic card access system on many interior and exterior doors, which improves security.

Alarms are also installed and monitored 24 hours a day across the St. Paul and Minneapolis campuses and in high-security areas.

Academic and Administrative Building Access

The Department of Public Safety receives thousands of requests each year by faculty, staff, and students for access to buildings, offices, and other rooms. Public Safety personnel strive to maintain the balance between personal safety, building security, and community needs of accessing campus facilities. This presents unique challenges in maintaining safety and security at both the Minneapolis and St. Paul campuses.

Access to academic and administrative facilities varies by use and location. The Department of Public Safety and the Facilities Management maintain and implements a schedule to lock and unlock exterior and interior doors in each academic and administrative building.

Many of the academic and administrative buildings have electronic card access installed on exterior doors. With this system, Public Safety electronically monitors certain doors 24 hours a day and will dispatch an officer to the door if an alarm indicates that the door has been forced open or is ajar.

To ensure that campus facilities are accessible without compromising security, Public Safety has established building access guidelines. Faculty, staff, or students who need access to their offices may do so by seeking permission from a supervisor who has control of the space and completing an access authorization form. This may be accomplished by filling out an electronic Request for Services form on the St. Thomas web page:

https://rfs.aws.stthomas.edu/

Once this request is on file, access can be granted when requested through Public Safety, and with the presentation of proper university photo identification. Due to university liability, Public Safety officers cannot accept memos, notes, or verbal authorization in place of the access authorization form.

Additionally, the use of university athletic and recreation facilities requires appropriate university identification for admittance.

Residence Hall Access

Exterior doors to residence halls are locked 24 hours a day, except during times when temporary access is needed (such as periodic building maintenance) or for students during move-in. Each exterior residence hall door is equipped with an electronic card reader, which replaces a traditional key system and greatly enhances building security. Individual resident doors are equipped with interchangeable cores and allow for expeditious key core changes during power outages, when room keys are lost, for roommate changes, or other immediate security concerns.

Only resident students, their guests, and those with approved access are allowed inside residence halls. All others are considered trespassers and residents are urged to report their presence to the Department of Public Safety.

Bernardi Campus Facility

The University of St. Thomas Bernardi Campus is located on the west bank of the Tiber River at Lungotevere delle Armi in Rome, Italy. Purchased by St. Thomas in 1999, the Bernardi Campus provides housing to St. Thomas students and others participating in academic and summer programs and offers accommodations for overnight guests. Situated in the heart of the modern Prati section of Rome, the campus is near both the center of Rome and Vatican City. Originally built as a private home in 1923, the building was purchased by an order of Spanish nuns in the 1950s. In 1999 the University restored and modernized the building with contemporary furnishings and spacious sleeping rooms.

The Bernardi campus can house a maximum of fifty people (students, guests, and staff included). The 17 student rooms on two residential floors, including 3 triples, 9 doubles and 5 singles, can accommodate a maximum of 32 students. In addition to the student rooms, the Bernardi Campus maintains two staff apartments and four guestrooms for guests of the university, friends, and families of the students, and alumni. A fully functional basement floor provides a computer lab, students' kitchenette, dining room, and laundry facilities. The main floor offers a chapel, guest room, and salotto (sitting room), in addition to the director's and facilities manager's main offices. Adjacent to the fourth floor is a rooftop terrace. Guests (non-students) make room reservations through the Bernardi Campus Director and must be a known UST community member or

sponsored by one. Because the Bernardi Campus makes such arrangements and does not offer hotel-style reservations to the general public, a higher level of security is maintained on campus.

Building Hours:

- Sunday – Thursday Building is locked at 11:30 p.m.
- Friday – Saturday Building is locked at 2 a.m.

For security and safety purposes, specific public areas in the building, such as the rooftop terrace, kitchen, dining room, and front office, are closed and locked after certain hours in the evening or at the discretion of the Bernardi staff.

Maintenance of Campus Facilities

The Facilities Management maintains university buildings and grounds with an interest in the general safety and security of university faculty, staff, and students. Public Safety officers also report safety and security hazards during routine patrol.

Public Safety frequently conducts security surveys, exterior lighting surveys, and inspections of electronic security systems in an ongoing effort to maintain existing conditions while increasing campus protection. Channels of internal communications exist to facilitate the repair or improvement of security systems on campus. Facilities Management recognizes the importance of responding promptly to requests that involve safety and security issues.

To help keep buildings safe and in good repair, it is important to promptly report maintenance problems. For plumbing, electrical, heating, elevator, door lock, key, and other maintenance concerns, contact Facilities Management at (651) 962-6530. On weekends and holidays, or after 4:30 p.m. on weekdays, call the Department of Public Safety at (651) 962-5100.

Enforcement and arrest authority of Public Safety personnel

The Public Safety Department has been charged by the University with the public safety functions for the university. The department functions as an agent of the university to provide a sensitive, measured response to all situations requiring public safety services.

The Department of Public Safety is open 24 hours a day, 7 days a week, and 365 days a year. Public Safety officers are responsible at all times for the enforcement of university regulations and all federal, state, and local laws as they apply to the University of St. Thomas

Public Safety officers are authorized to make citizen arrests and will detain people for local police agencies in accordance with state laws and university policies.

Public Safety Jurisdiction

Public Safety's jurisdiction encompasses on campus property that includes campus residence halls, buildings, and/or facilities; designated non-campus properties and facilities; public property adjacent to and accessible from the on-campus property, and leased, rented, or otherwise recognized and/or controlled buildings, spaces, and/or facilities. Public Safety has no jurisdiction or enforcement authority outside of its identified Clery reporting geography – this includes areas and/or properties that are not owned, rented, leased, recognized, or otherwise controlled by the university.

Working relationship between Public Safety, State and Local Police Agencies

The Department of Public Safety maintains a strong collaborative working relationship with federal, state, and local police agencies. Public Safety works with these agencies on criminal matters, special operations, and security details during special events on and off campus.

ST. PAUL POLICE INVOLVEMENT

As noted above, the Department of Public Safety and the St. Paul Police Department have a close working relationship. In addition to training together and working together on criminal matters, the two departments work closely with quality-of-life issues in the neighborhood around the St. Paul campus.

Quality of life complaints near the St. Paul campus are addressed using a team approach by the St. Paul Police Department, Public Safety, the Dean of Students Office, university public relations, and our neighbors to mitigate the effects of these public disturbances between students living in the neighboring community and the permanent residents in the area.

During each fall and spring semester, Public Safety hires off-duty St. Paul Police Department officers in to respond to the quality-of-life complaints in the neighborhood around St. Thomas. Warnings and citations are issued when appropriate. This special detail increases the quality of life for our students and neighbors and has resulted in many arrests for crimes-in-progress including but not limited to robbery, burglary, driving while impaired offenses, and hit-and-run.

MINNEAPOLIS POLICE INVOLVEMENT

The Department of Public Safety and the Minneapolis Police Department also have a close working relationship. Public Safety is actively involved in both the Downtown Block Club Association and the Downtown Security Council. By participating in and sponsoring the Block Club, Public Safety stays updated on crime occurring in the area. The Security Council and Minneapolis Police also keep Public Safety updated on crime prevention methods and events occurring in the city that may affect the general safety of the campus community.

We have a close working relationship with law enforcement agencies but no written memoranda of understanding in place.

Prompt Reporting

The Department of Public Safety strongly encourages victims and witnesses to report crime promptly to both Public Safety and the St. Paul or Minneapolis Police Departments. In some circumstances, reporting to university officials is required under our Non-Discrimination and Anti-Harassment Policy , Sexual Misconduct Policy , and Reporting Suspected Child Abuse Policy. Also, Public Safety officers provide encouragement and assistance in reporting incidents to the police if the victim elects to or is unable to make such a report.

All Public Safety personnel are trained to respond to a wide variety of situations, emergencies, complaints, and calls from the St. Thomas community on either the St. Paul or Minneapolis campuses. If any situation escalates beyond or falls outside officer training or policy, Public Safety personnel will contact proper emergency response authorities.

Pastoral and Professional Counselors

All employees and students of the university, including pastoral and professional counselors, are strongly encouraged to report crimes and encourage victims or witnesses of crime to voluntarily report these offenses to Public Safety. Pastoral and professional counselors are trained in how to report crimes to Public Safety and are provided with confidential reporting forms. The reporting person may request to remain confidential.

Notifications to the Campus Community

The University of St. Thomas Department of Public Safety is responsible for keeping the university community informed about safety concerns. In coordination with the Dean of Students, Residence Life, Human Resources, and other campus partners, Public Safety issues Timely Warnings, Emergency Notifications, and Community Notifications as appropriate. Each type of notice serves a specific purpose in promoting awareness, safety, and prevention.

Timely Warnings

Timely Warnings are issued when certain crimes, as defined by the Clery Act, occur on or near campus and represent a serious or continuing threat to the campus community.

- Purpose: To alert the university community about crimes that may pose an ongoing risk, provide tips for crime prevention, and encourage vigilance.
- Authority: Public Safety develops and issues Timely Warnings, sometimes in consultation with other university departments or law enforcement agencies.
- Confidentiality: The names of victims are never included in Timely Warnings.

Examples include incidents such as robberies, aggravated assaults, or a series of related thefts.

Emergency Notifications

Emergency Notifications are distinct from Timely Warnings and are issued when a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees, or visitors occurs on campus.

- Purpose: To inform the campus community quickly so individuals can take protective action.
- Authority: Public Safety is responsible for initiating Emergency Notifications and may coordinate with university leadership and local authorities as needed.

Examples include active threats, severe weather emergencies, or hazardous material incidents.

Community Notifications

Community Notifications are used to share important safety information that does not meet the criteria for a Timely Warning or Emergency Notification but may still affect the well-being of students, faculty, staff, and visitors.

- Purpose: To promote awareness of crime trends, suspicious activity, or personal safety concerns, and to provide resources for prevention.

Community Notifications may also include crime prevention tips, reporting options, and contact information. These notices are clearly marked if they do not rise to the level of a Timely Warning.

Means for Dissemination

The University of St. Thomas uses multiple methods to deliver timely and effective communication to the community. Depending on the nature and urgency of the situation, notices may be distributed through:

- The university's mass notification system (email, text message, push alerts through safety application, social media)
- Public Address (PA) systems
- Paper bulletins posted in residence halls and campus buildings
- Fire Alarm Systems
- Publications on the Public Safety Website
- In-person notifications delivered by Public Safety or other officials

Multiple members of Public Safety, the University Action Response Team (UART), or individuals designated by UART, are authorized to send out mass notifications. This layered approach ensures that critical information reaches the community quickly and through multiple channels.

Reporting Crimes and Safety Concerns

Prompt and accurate reporting of crimes or suspicious activity is essential for the effectiveness of all three types of notifications. Faculty, staff, students, and visitors are strongly encouraged to report incidents to Public Safety and, when appropriate, to local law enforcement (St. Paul Police Department, Minneapolis Police Department, or other local police agencies).

By working together, the university community helps ensure that accurate information is available to support safety, prevention, and compliance with federal law.

University of St. Thomas

PUBLIC SAFETY - ST. PAUL CAMPUS

2025 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	1	1	2	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	2	2	4	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	1	1	2	0	0
AGGRAVATED ASSAULT	1	0	1	0	0
BURGLARY	2	4	6	0	0
MOTOR VEHICLE THEFT	0	5	5	0	2
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2024 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	2	1	3	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	2	1	3	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	1	1	0	1
AGGRAVATED ASSAULT	1	2	3	0	1
BURGLARY	1	8	9	0	0
MOTOR VEHICLE THEFT	0	2	2	0	3
ARSON	1	0	1	0	0
UNFOUNDED CRIMES TOTAL: 0					

2023 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	6	0	6	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	1	1	0	0
AGGRAVATED ASSAULT	2	1	3	0	0
BURGLARY	0	2	2	0	0
MOTOR VEHICLE THEFT	1	1	2	0	2
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2025 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	1	0	1	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	122	5	127	0	1
DRUG LAW VIOLATIONS	5	0	5	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0

2024 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	2	2	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	97	11	108	0	3
DRUG LAW VIOLATIONS	1	0	1	0	0
ILLEGAL WEAPONS POSSESSION	1	0	1	0	0

2023 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	141	13	154	0	0
DRUG LAW VIOLATIONS	12	1	13	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0

ON CAMPUS

Clery Hate Crime Statistics

2025 ON CAMPUS Clery Act Reportable Offenses	Category of Hate Crime							
	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	1	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	2	0	0	0
Totals	**0**	**0**	**0**	**1**	**2**	**0**	**0**	**0**

2024 ON CAMPUS Clery Act Reportable Offenses	Category of Hate Crime							
	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	1	0	0	0	0	0	0	0
INTIMIDATION	1	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	**2**	**0**	**0**	**0**	**0**	**0**	**0**	**0**

2023 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

NON CAMPUS Clery Hate Crime Statistics

2025 NON CAMPUS Clery Act Reportable Offenses	Category of Hate Crime							
	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 NON CAMPUS Clery Act Reportable Offenses	Category of Hate Crime							
	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

PUBLIC PROPERTY

Clery Hate Crime Statistics

2025 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	1	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	1	0	0	0	0	0

2023 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2025 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	6	0	6	0	0
Domestic Violence	0	0	0	0	0
Stalking	3	7	10	0	0

2024 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	6	0	6	0	1
Domestic Violence	0	0	0	0	0
Stalking	12	5	17	0	0

2023 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	3	0	3	0	0
Domestic Violence	0	0	0	0	0
Stalking	3	3	6	0	0

2025	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2024	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2023	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

University of St. Thomas

PUBLIC SAFETY - MINNEAPOLIS CAMPUS

2025 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	1
AGGRAVATED ASSAULT	0	2	2	0	0
BURGLARY	0	2	2	0	0
MOTOR VEHICLE THEFT	0	1	1	0	0
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2024 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0
BURGLARY	0	2	2	0	0
MOTOR VEHICLE THEFT	0	2	2	0	4
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2023 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	2
AGGRAVATED ASSAULT	0	0	0	0	0
BURGLARY	0	1	1	0	0
MOTOR VEHICLE THEFT	0	4	4	0	1
ARSON	0	1	1	0	0
UNFOUNDED CRIMES TOTAL: 0					

2025 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0

2024 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0

2023 Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
ARRESTS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	1
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0
JUDICIAL REFERRALS					
LIQUOR LAW VIOLATIONS	0	0	0	0	0
DRUG LAW VIOLATIONS	0	0	0	0	0
ILLEGAL WEAPONS POSSESSION	0	0	0	0	0

ON CAMPUS

Clery Hate Crime Statistics

2025 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	**Race**	**Gender**	**Religion**	**Sexuality**	**Ethnicity**	**Disability**	**National Origin**	**Gender Identity**
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

NON CAMPUS

Clery Hate Crime Statistics

2025 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	**Race**	**Gender**	**Religion**	**Sexuality**	**Ethnicity**	**Disability**	**National Origin**	**Gender Identity**
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

PUBLIC PROPERTY

Clery Hate Crime Statistics

2025 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2025 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	0
Stalking	0	0	0	0	0

2024 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	1
Stalking	0	0	0	0	0

2023 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	0
Stalking	0	0	0	0	0

2025	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2024	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2023	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

University of St. Thomas

PUBLIC SAFETY - ROME CAMPUS

2025 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0
BURGLARY	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2024 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0
BURGLARY	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2023 Criminal Offenses	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
CRIMINAL HOMICIDE					
MURDER/NONNEGLIGENT MANSLAUGHTER	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0
SEX OFFENSES					
SEX OFFENSE: FONDLING	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0
SEX OFFENSE: STATUTORY RAPE	0	0	0	0	0
ROBBERY	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0
BURGLARY	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0
ARSON	0	0	0	0	0
UNFOUNDED CRIMES TOTAL: 0					

2025	Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
ARRESTS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0
JUDICIAL REFERRALS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0

2024	Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
ARRESTS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0
JUDICIAL REFERRALS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0

2023	Arrest and Judicial Referrals	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
ARRESTS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0
JUDICIAL REFERRALS						
LIQUOR LAW VIOLATIONS		0	0	0	0	0
DRUG LAW VIOLATIONS		0	0	0	0	0
ILLEGAL WEAPONS POSSESSION		0	0	0	0	0

ON CAMPUS

Clery Hate Crime Statistics

2025 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 ON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	**Race**	**Gender**	**Religion**	**Sexuality**	**Ethnicity**	**Disability**	**National Origin**	**Gender Identity**
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

NON CAMPUS

Clery Hate Crime Statistics

2025 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 NON CAMPUS	Category of Hate Crime							
Clery Act Reportable Offenses	**Race**	**Gender**	**Religion**	**Sexuality**	**Ethnicity**	**Disability**	**National Origin**	**Gender Identity**
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

PUBLIC PROPERTY

Clery Hate Crime Statistics

2025 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2024 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2023 PUBLIC PROPERTY	Category of Hate Crime							
Clery Act Reportable Offenses	Race	Gender	Religion	Sexuality	Ethnicity	Disability	National Origin	Gender Identity
MURDER/NONNEGLIGENT	0	0	0	0	0	0	0	0
NEGLIGENT MANSLAUGHTER	0	0	0	0	0	0	0	0
SEX OFFENSE: FONDLING	0	0	0	0	0	0	0	0
SEX OFFENSE: INCEST	0	0	0	0	0	0	0	0
SEX OFFENSE: RAPE	0	0	0	0	0	0	0	0
SEX OFFENSE: STATUTORY	0	0	0	0	0	0	0	0
ROBBERY	0	0	0	0	0	0	0	0
AGGRAVATED ASSAULT	0	0	0	0	0	0	0	0
BURGLARY	0	0	0	0	0	0	0	0
MOTOR VEHICLE THEFT	0	0	0	0	0	0	0	0
ARSON	0	0	0	0	0	0	0	0
ANY OTHER CRIME INVOLVING	0	0	0	0	0	0	0	0
SIMPLE ASSAULT	0	0	0	0	0	0	0	0
INTIMIDATION	0	0	0	0	0	0	0	0
LARCENY	0	0	0	0	0	0	0	0
DESTRUCTION OF PROPERTY	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0

2025 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	0
Stalking	0	0	0	0	0

2024 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	0
Stalking	0	0	0	0	0

2023 VAWA	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
	Student Housing	Other			
VAWA Crimes					
Dating Violence	0	0	0	0	0
Domestic Violence	0	0	0	0	0
Stalking	0	0	0	0	0

2025	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2024	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

2023	HAZING	ON CAMPUS		ON CAMPUS (TOTAL)	NON CAMPUS	PUBLIC PROPERTY
		Student Housing	Other			
HAZING						
HAZING		0	0	0	0	0

Crime Prevention Programs and Practices

Campus Safety is everyone's responsibility. In addition to investigating and reporting crimes that occur on campus, the Department of Public Safety is dedicated to aiding in the prevention of crime and in maintaining a safe campus environment through training, education and sharing information.

Responsibilities of the St. Thomas Community for Their Own Personal Safety

Members of the University of St. Thomas community must assume responsibility for their own personal safety and the security of their personal property. The following precautions provide guidance.

- Report all suspicious activity to Public Safety immediately.
- Never take personal safety for granted.
- Try to avoid walking alone at night. Use the Public Safety escort service.
- Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively. Remember to call Public Safety or St. Paul Police Department or Minneapolis Police Department or local police agency for help at the first sign of trouble.
- Carry only small amounts of cash.
- Never leave valuables (wallets, purses, books, phones, etc.) unattended.

- Always carry your keys and Key card. Do not lend them to anyone.
- Lock up bicycles and motorcycles. Lock car doors and close windows when leaving your car.
- Always lock the door to your residence hall room, whether or not you are there. Be certain that your door is locked when you go to sleep, and keep windows closed and locked when you are not at home. DO NOT PROP INTERIOR OR EXTERIOR DOORS.
- Do not leave valuables in your car, especially if they can be easily noticed.
- Engrave serial numbers or owner's recognized numbers, such as a driver's license number, on items of value.
- Inventory your personal property and insure it appropriately with personal insurance coverage.

The following is a list of programs and projects available to faculty, staff, and students at the University of St. Thomas:

Escort Service

Each year, Public Safety provides community members escorts to their cars, classes, or other locations within an approximate six-block radius of the St. Paul campus, and an approximate two-block radius of the Minneapolis campus.

All university faculty, staff, students, and visitors are encouraged to use the escort service when appropriate and for each individual's personal safety needs. Several thousand escorts are provided annually.

Campus Crime Prevention Month

Each September, Public Safety provides information on crime prevention to the campus community through brochures, flyers, and presentations. Representatives from Public Safety, the St. Paul and Minneapolis Police Departments, and other key departments on campus are on hand at both the St. Paul and Minneapolis campuses to offer crime prevention tips and personal safety information. The major areas addressed each year involve general personal safety, protection of personal property, bike and motor vehicle theft prevention, sexual assault awareness, and drug and alcohol abuse.

Student Orientation Program

Public Safety provides information on campus safety policies, procedures, and crime prevention on an annual basis during and at every new student orientation.

Sexual Violence and Sexual Harassment Training

Employee orientation programs and online training programs offered to new staff and faculty and orientation programs for undergraduate students and online training for all students include sexual

violence and sexual harassment awareness training in order to increase awareness and response. Current employees may also be required to take a refresher or updated courses.

Public Safety Seminars

Public Safety staff is also available on request to conduct site security surveys and seminars on a variety of topics including personal safety, self-defense, first-aid and CPR, and theft prevention. Materials containing tips for personal safety and crime prevention are available at the St. Paul and Minneapolis campus Public Safety offices.

Crime prevention is a top priority for Public Safety. The previous section outlines many of the programs used to inform the university community about crime prevention. The new student orientations, Campus Crime Prevention Month, Public Safety seminars, and the use of Public Safety Community Notifications, and Timely Warnings are all tools to advise the community of crime prevention measures.

Public Safety also promotes crime prevention through periodic use of a variety of novelty items, including posters, key chains, and bookmarks. These items include emergency telephone numbers and are distributed in conjunction with regularly scheduled programs and services.

Public Safety performs site security surveys, or security audits, for employees, students, and departments upon request. Security audits include recommendations, instruction, and troubleshooting services for access control, surveillance systems, and alarm systems.

Public Safety maintains a strong working relationship with university public relations and The Crest (St. Thomas student Journalist). Close contact with these news agencies provides another avenue for the dissemination of accurate information regarding significant or recurring incidents and provides tips to prevent similar crimes.

A weekly incident summary publication and crime log are also available for online viewing at http://www.stthomas.edu/publicsafety/reports/campuscrimefirelog/. This log includes a brief description of campus crimes and incidents as reported to, or by, Public Safety.

Public Safety does a comprehensive review of safety issues in the planning of events on campus. It works with campus event planners in assessing safety needs and the use of public safety services. Additionally, there are post-event action reports that are done after events or major incidents to better learn how safety may be improved.

Public Safety Monitors SPPD and MPD Reports

The University of St. Thomas does not officially recognize or sanction student organizations that have off-campus locations or housing facilities.

However, as noted in the preceding sections the Department of Public Safety and the St. Paul and Minneapolis Police Departments have a close working relationship with each other. In addition to working together on criminal matters, Public Safety and their public counterparts work closely in neighborhood matters.

St. Paul Police and Public Safety share information regarding criminal and suspicious activity on and near campus, and at residences believed to be owned or controlled by university students. These students are subject to dual jurisdiction and may be sanctioned by both the university and the city.

The Public Safety Department receives periodic reports from the Minneapolis Police Department of crimes that occur on or near campus. These reports are documented in a Public Safety report to be included in our crime log and assist with timely warnings.

Public Safety will periodically request reports from the St. Paul Police Department of crimes that occur within or Clery Act geography. These reports are documented in a Public Safety report to be included in our crime log and assist with timely warnings.

Domestic Violence, Dating Violence, Sexual Assault, and Stalking

To eromfindinformation regarding the university's policy regarding St. Thomas' campus programs to prevent domestic violence, dating violence, sexual assault, and stalking and procedures to follow when an incident of domestic violence, dating violence, sexual assault, or stalking has been reported, including a statement of the standard of evidence that will be used during any institutional conduct proceeding arising from such report (see sexual-misconduct-policy.pdf (stthomas.edu) or Attachment B).

Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The University of St. Thomas is committed to maintaining high standards of respect and civility that are both implicit and explicit in its convictions statement. This commitment extends to creating and maintaining a learning environment that is free of sexual misconduct and that promotes personal dignity and fair treatment of all members of the University community.

Sexual misconduct, including sexual assault, domestic violence, dating violence, and stalking, is a serious breach of that commitment and compromises the integrity of human relationships and threatens the security and well-being of all individuals. Not only is sexual misconduct unlawful but it also undermines the atmosphere of trust and respect that is essential to creating a healthy working and learning environment. Sexual misconduct interferes with a student's right to an education free from sex discrimination and is a violation of Title IX of the Education Amendments of 1972. In recognition of this, the University has adopted a Sexual Misconduct Policy that is designed to investigate and resolve such claims in an equitable and impartial way while respecting the rights of all parties involved.

This statement of policy is intended to inform the community of our comprehensive plan to address sexual misconduct, the available educational programs, and the relevant procedures that address sexual assault, domestic violence, dating violence and stalking.

A. Important Definitions

1. Clery Act Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking

The University of St. Thomas prohibits dating violence, domestic violence, sexual assault and stalking as those terms are defined by the Clery Act and as those terms are defined in the University's Sexual Misconduct policy. The Clery Act defines those terms as follows:

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

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

Domestic Violence is defined as a felony or misdemeanor crime of violence committed

- by a current or former spouse or intimate partner of the victim.
- by a person with whom the victim shares a child in common.
- by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner.
- by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred;
- by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Stalking is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to

- fear for the person's safety or the safety of others; or
- suffer substantial emotional distress.

Sexual Assault is defined as an offense that meets the definition of Rape, Fondling, Incest or Statutory Rape as used in the FBI's UCR program and included in Appendix A of 34 CFR Part 668. According to the National Incident-Based Reporting System User Manual from the FBI UCR program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim if incapable of giving consent."

- Rape is defined as the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.
- Incest is defined as nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape is defined a nonforcible sexual intercourse with a person who is under the statutory age of consent.

2. Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking under Minnesota Law:

In addition to being prohibited by St. Thomas policy, domestic violence, dating violence, sexual assault and stalking are prohibited by Minnesota law.

Domestic Violence: The state of Minnesota does not define the term "domestic violence" but does define the similar term of "domestic abuse." See Minn. Stat. §. 609.2242. Under Minnesota law, domestic abuse means the following, if committed against a family or household member by a family or household member:

- physical harm, bodily injury, or assault
- the infliction of fear of imminent physical harm, bodily injury, or assault
- terroristic threats, within the meaning of section 609.713, subdivision 1; or criminal sexual conduct, within the meaning of sections 609.342, 609.343, 609.344, 609.345, or 609.3451; or interference with an emergency call within the meaning of section 609.78, subdivision 2
  A "family or household member" means the following:
    - spouses and former spouses;
    - parents and children;
    - persons related by blood;
    - persons who are presently residing together or who have resided together in the past;
    - persons who have a child in common regardless of whether they have been married or

have lived together at any time;

    - a man and woman if the woman is pregnant and the man is alleged to be the father,

regardless of whether they have been married or have lived together at any time; and

    - persons involved in a significant romantic or sexual relationship

Dating Violence: The state of Minnesota includes dating violence in the domestic abuse definition above. See Minn. Stat. § 609.2242.

Sexual Assault: The state of Minnesota does not define the term sexual assault in its statutes; however, acts of sexual assault are included in Minnesota's criminal sexual conduct statutes. Under Minnesota law, criminal sexual conduct falls into five categories: first through fifth-degree criminal sexual conduct. First-degree criminal sexual conduct carries the most severe penalties and fifth-degree the least. See Minn. Stat. §§ 609.341 to 609.3451. Generally speaking, the first-degree and third-degree crimes apply to sexual conduct involving sexual penetration of the victim; the second-, fourth-, and fifth-degree crimes apply to sexual conduct involving sexual contact with the victim without sexual penetration.

Stalking: The state of Minnesota defines stalking as follows: conduct which the actor knows or has reason to know would cause the victim under the circumstances to feel frightened, threatened, oppressed, persecuted, or intimidated, and causes this reaction on the part of the victim regardless of the relationship between the actor and victim. See Minn. Stat. § 609.749.

3. Definition of *Consent* Under Minnesota Law and St. Thomas Policy.
    a. Minnesota's criminal sexual conduct laws define ***consent*** as follows:

"Consent" means words or overt actions by a person indicating a freely given present agreement to perform a particular sexual act with the actor. Consent does not mean the existence of a prior or current social relationship between the actor and the complainant or that the complainant failed to resist a particular sexual act. A person who is mentally incapacitated or physically helpless as defined by this section cannot consent to a sexual act. Corroboration of the victim's testimony is not required to show lack of consent.

See Minn. Stat. § 609.341.

b. St. Thomas defines ***consent*** as follows:

Consent is clear conduct or words that indicate a person freely agrees to engage in a sexual act at the time of the act, subject to the following:

- In order to give consent, one must be of legal age.
- Consent must be knowing and voluntary.
- Silence or failing to resist a sexual act does not constitute consent. Lack of a negative response does not constitute consent. Consent is a freely given "yes" (through words or conduct), not the absence of "no."
- A current or previous relationship does not imply consent to a sexual act.
- A person who is asleep or unconscious cannot consent to a sexual act.
- Consent may not be obtained through threats or coercion.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity. A person who would like to initiate a new form of sexual activity is responsible for obtaining consent for that form of sexual activity.
- Consent, once given, may be withdrawn at any time. Withdrawal of consent must be clearly communicated through words or conduct. When consent is withdrawn, the sexual activity must stop.
- Consent is not effective if a person knows, or reasonably should know, that the other person is incapacitated, regardless of the reason for incapacitation. [See definition of Incapacitation].

Although consent does not need to be verbal, verbal communication is the most reliable way to ask for and determine whether consent has been given. The University's definition of consent is an affirmative consent standard.

B. <u>Educational programs and campaigns to promote the awareness of domestic violence, dating violence, sexual assault, and stalking, including primary prevention and awareness programs for all incoming students and new employees and ongoing prevention and awareness campaigns.</u>

The University educates the University community about domestic violence, dating violence, sexual assault, and stalking through a variety of prevention and awareness programs. The University recognizes that no single event, training or policy will eliminate sexual violence, dating violence or other forms of sexual misconduct from our community. We work to take a multitude of prevention and awareness strategies. Following a public health approach, outlined in the Catholic Health Initiatives Violence Prevention Resource Guide we focus on creating a comprehensive approach to violence prevention. A few examples of our efforts include;

1. In 2015 all University of St. Thomas students were required to complete an online sexual misconduct awareness and prevention training. This requirement has continued annually for all incoming students.
2. In 2018, all employees were required to complete an online sexual misconduct awareness and prevention training. That requirement includes refresher online training every two years.
3. Our Sexual Misconduct Policy and Procedures outlines clearly our commitment to promoting and protecting the personal dignity and well-being of every member of our community. The policy and procedures also ensure we respond to reported incidents of sexual misconduct in a prompt, fair and equitable manner.
4. Throughout the school year we utilize the digital screens across campus with messages about healthy relationships, decision-making and communication.
5. The University of St. Thomas is an active participating member of the Ramsey County Sexual Assault Protocol Team (SAPT). Our participation on this team helps ensure our response to sexual misconduct is based in best practice and collaborative with the community response.
6. We implement bystander intervention training in a variety of formats across campus. This information helps student recognize high risk situations that could lead to violence and offers safe ways to intervene; making it less likely a person will be hurt. Bystander Intervention workshops are integrated into student leader trainings, including residence life student leaders, peer ministers, orientation leaders and welcome day leaders. Bystander Intervention workshops open to the entire student population are offered throughout the academic year.
7. University student athletes are provided with sexual misconduct training, including matters of prevention and awareness, on an annual basis, in accordance with NCAA requirements.

The University also addresses sexual misconduct prevention and response at new student orientation for undergraduates, during welcome weekend (first weekend) activities, and in the undergraduate First Year Experience Course, and through new faculty and staff orientation. Education and awareness programs are also offered to new graduate students through schools and colleges.

The University's prevention and awareness programs available to new and continuing students and employees also include: Healthy Relationships Month (October), Sexual Assault Awareness

Month (April) including the Clothesline Project and Take Back the Night (offered through the Luann Drummer Center for Women), Start by Believing Campaign (a collaboration with the Undergraduate Student Government), Breaking Ice Theater (offered during welcome weekend activities);educational and awareness programs (art exhibits, panel discussion, workshops, social media campaigns) available to all members of the campus community; regular training for faculty and staff involved in student life and student activities; classroom discussions led by faculty when relevant to course subject; easy on-line access to the University's Sexual Misconduct Policy and resolution procedures; on-line information about what to do if you are a victim or if a friend is a victim of sexual assault; on-line and other promotional information about the escort service available from the University's Public Safety department; on-line and other promotional information about consent and healthy relationships, periodic programs for students living in residence halls; and literature and resources on sexual violence and relationship violence available on the Dean of Students website and in restrooms on campus. The University promotes violence prevention, bystander intervention, and risk reduction. The University's Luann Drummer Center for Women and Center for Well-Being supports student leaders in a variety of student-led initiatives intended to raise awareness of issues related to sexual assault, relationship violence, and stalking.

The University's education, prevention and awareness programs cover:

- The University's prohibition of sexual assault, dating violence, domestic violence, stalking (as those terms are defined by Clery) and other forms of sexual misconduct and other information about the University's Sexual Misconduct Policy;
- Definitions of sexual assault, dating violence, domestic violence, and stalking;
- The definition of consent, under the University's Sexual Misconduct Policy and Minnesota law;
- Safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is risk of domestic violence, dating violence, sexual assault, or stalking, including information on recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options (such as distraction or calling for help), and taking action to intervene;
- Information on risk reduction to recognize signs of abusive behavior, decrease perpetration and bystander inaction, increase empowerment for victims in order to promote safety, and help individuals and communities address conditions that facilitate violence;
- Examples of healthy relationships and communication;
- Possible sanctions or protective measures the University may impose;
- Procedures victims should follow if a sex offense, domestic violence, dating violence, sexual assault, or stalking has occurred;

- Information about the procedures for institutional disciplinary action in cases of alleged domestic violence, dating violence, sexual assault, or stalking.

C. Procedures victims should follow if a sex offense, domestic violence, dating violence, sexual assault, or stalking has occurred.

1. What to do following an assault or incident of domestic violence, dating violence or stalking

As soon as possible after an assault, an attempted assault, a perceived assault, or other violent act or incident of stalking, victims should talk to someone who they trust. That someone may be a friend, a counselor, the Title IX Coordinator or other professional staff person at the university, a university Public Safety officer or a police officer. The university recognizes that with incidents of sexual violence it can take weeks, months or even years before victims realize that an assault did indeed take place. Nevertheless, the university encourages victims of sexual violence to:

- Report the incident to the Department of Public Safety and/or the police;
- Seek support from appropriate medical resources;
- Utilize on-campus and/or off-campus counseling resources;
- Contact the Title IX Coordinator or other University Official with Authority to report the incident.

Information and free, confidential assistance is also available 24 hours a day from SOS in St. Paul at (651) 643-3006.

If victims do not wish to pursue an official course of action or are unsure what action to take, victims may contact the University of St. Thomas Counseling and Psychological Services department at (651) 962-6780. Counseling and Psychological Services staff psychologists are legally bound to maintain confidentiality and will not report or officially pursue an incident without consent of the victim.

2. How and to whom the alleged offense should be reported

The University encourages victims of sexual violence to contact Public Safety and the police as soon as possible so that the authorities can take whatever action is necessary to preserve evidence, pursue the assailant or take other appropriate steps. Making a police report involves talking to an officer about the incident and providing other requested cooperation. St. Thomas Public Safety will help facilitate the making of a police report at the request of a student or employee, including calling the police and asking an officer to come to campus.

To report a crime or request assistance, contact the following agency:

Department of Public Safety (St. Thomas will assist you in notifying the appropriate police department as necessary)

EMERGENCY LINE - (651) 962-5555, or 5555 from any campus phone

Non-emergency on the St. Paul Campus - (651) 962-5100

Non-emergency on the Minneapolis Campus - (651) 962-5100 or (651) 962-4100

Local police agencies can be reached from within their respective cities at the following phone numbers.

St. Paul Police Department

Emergency - 911

Non-emergency - (651) 291-1111

Minneapolis Police Department

Emergency - 911

Non-emergency - (612) 348-2345

Reports may also be made to the University by contacting an Official with Authority, which includes the Title IX Coordinator, members of the Dean of Students office, Human Resources Partners and Public Safety supervisors and officers, as well as additional individuals identified on page 5 of the Sexual Misconduct Policy. For contact information, see *On-Campus Places to Report Sexual Violence*.

Contacting Public Safety and law enforcement immediately can help ensure the preservation of evidence. Preserving evidence of sexual assault, relationship violence, and stalking is critical if a victim wants to seek criminal prosecution or a harassment restraining order. Detailed advice on preserving evidence can be found at What to do if you have been sexually assaulted and is also included below.

3. The importance of preserving evidence as may be necessary to the proof of a criminal domestic violence, dating violence, sexual assault, or stalking or in obtaining a protection order;

Contacting Public Safety and law enforcement immediately can help ensure the preservation of evidence. Preserving evidence of sexual assault, relationship violence, and stalking is critical if a victim wants to seek criminal prosecution or a harassment restraining order. Detailed advice on preserving evidence can be found on Title IX website and is also outlined below.

Preserving evidence of sexual assault:

It is strongly recommended that all victims of sexual assault or violence seek medical attention within hours of the crime. A forensic medical exam by a Sexual Assault Nurse Examiner (SANE nurse) or another medical professional allows evidence to be preserved. Such an exam is

recommended even if survivor has not yet decided whether to make a report to the police or the University. Until a report is filed or an exam conducted:

- Do not shower
- Do not douche
- Do not change or wash clothes; if you do change clothes, don't wash them. Put them in a paper bag.
- Do not comb hair
- Leave the scene untouched
- Do not disturb evidence

Preserving evidence of stalking

To preserve evidence, individuals who suspect that they are being stalked should:

- Keep an up-to-date, precise, and detailed journal or "log" of every encounter with the stalker. Include the date, time, location, form of contact or interaction, and any witnesses.
- Keep all text messages, electronic messages, and/or handwritten notes.
- Keep all messages you received or sent through any and all social medias; if electronic messages, videos, or photos cannot be stored, or are destroyed after viewing, ask a friend to take a video or picture on their phone or take a screen shot.
- Do not delete your phone's call log.
- Contact university or law enforcement authorities for assistance.

Preserving evidence of domestic violence and dating violence

To preserve evidence, individuals who are victims of relationship violence should:

- Seek medical attention for injuries. A medical provider can assist in documenting injuries and collecting specimens that may preserve evidence, such as photographing injuries and collecting swabs, and can provide advice on maintaining your safety. For cases of sexual assault, an exam by a sexual assault nurse examiner (SANE) may help preserve potential evidence. A SANE exam is available even in cases where an individual is not sure they want to report to police. To have the best chance at preserving possible evidence, a SANE exam should take place as soon as possible after an assault. Many hospitals require that a SANE exam be conducted within 3-5 days of the assault. In Ramsey County, a SANE exam is available up to 10 days after an assault. At the Center for Well-Being, there is no time limit to receive a SANE exam, however, specimen collection for possible evidence would not take place more than 10 days after an assault.

- Keep any computer, internet/ email, text messages, social media and other forms of electronic evidence (voicemails, answering machine tapes, emergency number police tapes).
- Keep a list of any witnesses who can provide information about any incidents of relationship violence.
- If reporting an incident, do not clean up or alter the location in which an act of violence occurred; broken household items should not be moved.
- Maintain records of any past incidents of relationship violence, including statements from service providers involved in past incidents of violence, prior police incident reports, prior medical files detailing any past injuries, previous court orders such as protective orders or bail restrictions, and any past criminal record/history of the offenders or suspects. Ensure that these records are in a place where they won't be found or can't be read by the offender.

4. Options regarding law enforcement and campus authorities

Victims have the right to notify law enforcement authorities about an incident of sexual assault, domestic violence, dating violence, and stalking and to be assisted by campus authorities in notifying law enforcement if the victim chooses to make a report. The University will comply with a student's request for assistance in notifying law enforcement authorities. Victims also have the right to decline to notify authorities.

On request, Department of Public Safety will assist law enforcement officials in a timely fashion in obtaining, securing and maintaining evidence in connection with an incident of sexual violence.

Victims are always encouraged to report incidents to the Title IX Coordinator to learn more about available supportive measures and process options that may be available.

5. Existing on- and off-campus counseling, mental health, or other student services for victims of sex offenses

The University provides written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, and other services available for victims, both within the institution and in the community. Several resources are listed below, and several resources are listed in the University's Sexual Misconduct Policy.

Medical Resources

Center for Well-Being

University of St. Thomas

35 S Finn St, St. Paul, MN 55105

(651) 962-6750

Regions Hospital Emergency Room

640 Jackson Street
St. Paul, MN 55101

(651) 221-2121

Sexual assault questions | Regions Hospital (healthpartners.com)

United Hospital Emergency Room

333 North Smith Avenue

St. Paul, Minnesota

55102

(651) 241-8755 (direct connection to the Emergency Room)

https://www.allinahealth.org/health-conditions-and-treatments/forensic-nursing-services

Hennepin County Medical Center Emergency Room

701 Park Avenue

Minneapolis, Minnesota 55415

Sexual Assault Resource Service:

(612) 873-5832

https://www.hennepinhealthcare.org/support-services/violence-assault-and-abuse-resources/

Counseling/Advocacy Resources

St. Thomas Counseling and Psychological Services

(651) 962-6780

St. Thomas Campus Ministry

(651) 962-6560

Sexual Offense Services (S.O.S.)

(651) 643-3006

Sexual Violence Center of Hennepin County

(612) 871-5111

RAINN (Rape, Assault, and Incest National Network)

https://www.rainn.org/articles/how-can-therapy-help

1 (800) 656-HOPE (24-hour hotline; free and confidential)

Minnesota Coalition for Battered Women

60 East Plato Blvd., Suite 130
St. Paul, MN 55107
Office: (651) 646-6177 or (800) 289-6177

Visa and Immigration Assistance

Immigrant Law Center

651-641-1011

Legal Assistance

LawHelpMN

https://www.lawhelpmn.org/issues/abuse-violence-crime-victims-rights/sexual-assault-and-other-crime-victims

Other On-Campus Assistance

Title IX Coordinator

(651) 962-6882

Dean of Students' Office

Room 241, Anderson Student Center
(651) 962-6050

Dean of Students Website

Additional information about existing counseling, health, mental health, victim advocacy, legal assistance resources are available on the Title IX website.

6. Orders of protection, no contact orders, restraining orders, or similar lawful orders issued by a court or St. Thomas.

Victims of sexual assault, domestic violence, dating violence, and stalking may seek a harassment restraining order or order for protection from a state court. The University of St. Thomas will comply with any lawfully issued harassment restraining order or order for protection. If you have obtained an order for protection or harassment restraining order against another member of the community, please contact the Title IX Coordinator, Dean of Students, Human Resources, or Public Safety to inform the University of the order and to ensure that the University is able to take appropriate steps

with respect to the order. In addition, the University seeks to support students and employees who may need to obtain an order for protection or harassment restraining order. Employees may take reasonable time off work to seek a harassment restraining order or order for protection and the University prohibits retaliation against an employee who seeks such an order. Students who need to seek a harassment restraining order should contact the Title IX Coordinator if they need class accommodations. Information about obtaining harassment restraining orders and orders for protection is available from both Ramsey and Hennepin Counties. In Ramsey County, call the Domestic abuse and Harassment Office at 651-266-5130. The requirements for obtaining a harassment restraining order are available on the Minnesota Court website here. Instructions for obtaining an order for protection are available on the Minnesota Court website here. Minnesota recommends that parties seeking an order for protection contact an advocacy service, like Minnesota Coalition for Battered Women, for assistance in seeking an order for protection.

The University has the ability, in appropriate circumstances, to issue no-contact directives to community members and to issue notices limiting campus access by community members or members of the public. Community members should contact the Title IX Coordinator or UST Public Safety (651-962-5100) to request this type of protection. The University is a private entity and does not issue orders for protection.

D. Procedures for institutional disciplinary action in cases of alleged domestic violence, dating violence, sexual assault, or stalking.

1. Response and Resolution Procedures Generally

The University follows its Sexual Misconduct Response and Resolution Procedures in cases involving domestic violence, dating violence, sexual assault, stalking, and other forms of sexual misconduct. Copies of these procedures are available on the Title IX website: http://www.stthomas.edu/title-ix/sexualmisconduct/. A copy of these procedures is also attached as Attachment B. These procedures describe in detail the steps, timelines, and decision-making process followed as part of processing a formal complaint. An alternative resolution process is also available for resolving allegations. When a student or employee reports sexual misconduct to the University, they are provided written information about their rights and options to pursue a complaint through the University's processes.

The University's response and resolution procedures are designed to provide for a prompt, fair, and impartial investigation and resolution of sexual misconduct complaints and concerns. A preponderance of the evidence ("more likely than not") standard is used. Both the reporting party and the responding party are provided written information about available support resources, on and off-campus, and such resources are also available on the Title IX website.

2. Supportive Measures Available

The Response Manager, in consultation with appropriate administrators and informed by the wishes of the Reporting Party, will consider whether and which supportive measures are reasonably

necessary or appropriate to restore or preserve equal access without unreasonably burdening the other party, including measures designed to protect the safety of all parties and the broader St. Thomas community, or deter sexual harassment. If the Response Manager and appropriate administrators determine that certain supportive measures are reasonably necessary and appropriate, they are authorized to take or direct such action.

Examples of supportive measures include, without limitation:

- Offering counseling services;
- Allowing for deadline extensions or other course-related adjustments;
- Establishing a mutual "no contact" directive prohibiting the Responding Party and Reporting Party from communicating with each other.
- Prohibiting a Responding Party from physically entering or being on St. Thomas property.
- Prohibiting a Responding Party from participating in St. Thomas-sponsored events.
- Changing a Reporting Party's or Responding Party's on-campus residence or prohibiting a Responding Party from residing in a St. Thomas residence.
- Changing a Reporting Party's or Responding Party's student or employee status, in consultation with appropriate administrator(s).
- Changing a Reporting Party's or Responding Party's work or class schedule, in consultation with appropriate administrator(s).
- Issuing a timely warning of any reported incident that presents a serious or continuing threat or danger to the community.
- Providing information about orders for protection and harassment restraining orders in appropriate cases.
- Notifying and consulting with appropriate St. Thomas administrators, faculty and staff members as warranted under the circumstances.

Supportive measures will be determined on a case-by-case basis, and may also include community-based measures, such as increased security or monitoring of certain areas of campus or training provided to particular community groups. Either party is free to raise concerns regarding supportive measures with the Response Manager. The Response Manager may modify or initiate new or different supportive measures at any point during the response and resolution process based on the Response Manager's determination of how best to protect the parties and the broader St. Thomas community.

If the Response Manager is not immediately available and the Title IX Coordinator, Dean of Students, or Chief Human Resources Officer determines that immediate action is reasonably

necessary and appropriate, the Title IX Coordinator, Dean of Students and/or Chief Human Resources Officer is authorized to take or direct such action.

3. Equitable Rights and Opportunities for the Parties

In the Formal Process, the responsibility lies with St. Thomas to gather evidence sufficient to reach a determination regarding responsibility based on the preponderance of evidence standard. Additionally, the Complainant and Respondent can expect the following:

- equitable procedures that provide both parties with a prompt and impartial investigation and resolution conducted by individuals who receive annual training on conduct prohibited by the policy;
- an equitable opportunity to identify relevant witnesses and other evidence and to suggest possible questions to be asked of witnesses during the investigation, and to present such witnesses and evidence during a live hearing, if any;
- an opportunity to meet with the Investigator(s) and present information on their own behalf, including written and oral statements and physical exhibits;
- an opportunity to receive similar and timely access to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the complaint, including evidence upon which St. Thomas does not intend to rely in reaching a determination regarding responsibility, and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation;
- timely written notice of meetings and hearings, including the date, time, location, participants, and purpose;
- the opportunity to have an advisor of the individual's choice, accompany the individual to meetings and proceedings that are part of the response and resolution process. See Part V.C for additional information;
- the opportunity to determine when and whether to provide or repeat a description of an incident of reported sexual misconduct, and to be informed of the consequences, if any, of not providing or repeating such a description. A decision not to provide or repeat a description of an incident involving reported sexual misconduct may impact the outcome of the investigation or hearing because the recommendation or determination regarding responsibility made by the Investigator(s) and the determination regarding responsibility by an appointed hearing panel in ,matters involving a live hearing will be based on a Preponderance of the Evidence.
- The provision of remedies to a Complainant/Reporting Party where a determination of responsibility for sexual harassment has been made against Respondent/Responding Party.

4. Notice of Outcome

Following the conclusion of a formal process, the Response Manager will provide a written notice of outcome, by letter or email, to the Complainant and to the Respondent. The notice also will include information about the appeal process and when the outcome will be final. In matters that involved a hearing, the notice of outcome will include a copy of the hearing panel's determination of responsibility. In matters resolved without a hearing that involved sexual assault, domestic violence, dating violence, or stalking and in matters involving reports of sexual harassment in which a faculty member is a party and has asserted a defense of academic freedom, the notice of outcome will include information about the opportunity to review the final factfinding report. Any such review of the final factfinding report will be conducted a manner consistent with any applicable St. Thomas practices regarding confidentiality and privacy, including the Family Educational Rights and Privacy Act, if applicable and consistent with practices outlined above regarding review of the preliminary report. The written notifications must be sent within ten (10) working days of the Response Manager's receipt of the final factfinding report and will be sent to the Complainant and the Respondent at the same time.

St. Thomas may be limited in the information it may share with the Complainant as part of or otherwise in connection with this notice of outcome. At a minimum, the outcome letter sent to the Complainant will contain the following information: the determination regarding responsibility, information about the rationale, and, if the Respondent was determined responsible for a policy violation, any sanctions imposed that directly relate to the Complainant. In sexual misconduct incidents involving allegations of Title IX-based or non-Title IX-based sexual assault, domestic violence, dating violence or stalking, the notice of outcome also will contain additional information about sanctions against a Respondent who was determined responsible for a policy violation.

The Response Manager also will ensure that appropriate St. Thomas administrators, faculty and/or staff members who have a need to know information about the outcome have been or are provided with such information. This may include the member(s) of the President's Cabinet responsible for a Respondent's school, college or unit, and in the circumstance of Respondents who are employees, the Respondent's supervisor.

If there is any change to the outcome following delivery of the original notice of outcome, including a change as a result of a typing error, the Complainant and Respondent will be provided notice of the change at the same time.

5. Possible sanctions or protective measures that the University may impose following the final determination of an institutional disciplinary procedure

Students, employees, and third parties who are found to have engaged in sexual misconduct, including sexual assault, domestic violence, dating violence, and stalking, will be subject to disciplinary action.

St. Thomas may impose different sanctions depending on the particular violation, facts and circumstances, including but not limited to the severity of the offense, any previous conduct

violations or disciplinary action, and whether the Respondent poses a threat to the health or safety of member(s) of the St. Thomas community. The imposition of sanctions is designed to address sexual misconduct, prevent its recurrence and remedy its effects, while supporting and advancing the University's mission and convictions. The sanctions that may be issued in cases involving sexual assault, dating violence, domestic violence, and/or stalking[1] include but are not limited to the following:

Student Responding Party

- Written warning;
- No-contact order;
- Disciplinary probation;
- Requirement that Respondent attend educational sessions or programs;
- Requirement that Respondent participate in drug and/or alcohol treatment;
- Requirement to participate in psychological assessment;
- Behavioral contract;
- Removal from University housing;
- Removal from specific course(s) or activities;
- Restriction on campus privileges and access;
- Continuing any interim measures in place;
- Suspension of one or more semesters, with reinstatement conditions that may include meeting with the Dean of Students; and/or
- Expulsion.

Faculty/Staff Responding Party

- Written warning;
- Requirement to attend educational sessions or programs;
- Requirement to participate in drug and/or alcohol treatment;
- Behavioral contract;
- Disciplinary letter;

[1] The same range of sanctions is considered for each of these offenses, depending on the particular facts and circumstances and the severity of the offense. A written warning will rarely be used, alone, as a sanction, but may be used in combination with other sanctions.

- Unpaid suspension;
- Loss of faculty or staff privilege(s);
- Demotion (staff);
- Notice of contract non-renewal (contracted staff and faculty without tenured appointment);
- Termination (staff; faculty without an annual contract); and/or
- Recommendation to President to institute dismissal for cause proceedings (faculty with an annual contract or tenured appointment).

The sanctions may include one or a combination of the actions described above. Sexual assault, dating violence, domestic violence and stalking are very serious offenses. While the sanction issued will depend on the particular facts and circumstances, sanctions are often on the more severe end of the range listed above.

5. Appeal

Both the Complainant and the Respondent are entitled to appeal the results of the Formal Process if on one or more of the following bases:

a. a procedural irregularity occurred that affected the outcome of the process, including but not limited to that the decision was not supported by a preponderance of the evidence or was arbitrary and capricious;

b. the decision violated academic freedom;

c. there has been discovery of new evidence by the appealing party that was not reasonably available at the time of the determination regarding responsibility that could affect the outcome of the matter;

d. The Title IX Coordinator, Investigator(s), or hearing panel had a general or specific conflict of interest or bias against the Complainant or Respondent that affected the outcome.

7. Training for Campus Officials who Conduct Response and Resolution Process

The response and resolution procedures are conducted by officials who receive training on issues related to domestic violence, dating violence, sexual assault, and stalking and training on how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability. Such training is provided annually, or more frequently, and an official must receive training prior to his or her involvement in the response and resolution procedure. Training topics include:

Information on identifying and analyzing relevant evidence; effective techniques for questioning witnesses, including trauma-informed techniques, procedural rules for conducting investigations, including the standard of review and providing equitable opportunities to the parties; writing

investigative reports, and understanding law enforcement investigations in sexual assault and domestic and dating violence situations.

8. Opportunity to Be Accompanied by a Support Person of Choice

As part of the University's response and resolution procedures, the reporting party and the responding party are entitled to the same opportunities to be accompanied by a support person of their choice to any meeting or other institutional disciplinary proceeding. The support person may advise and consult with the party they are accompanying but is not otherwise permitted to participate in any proceeding. The support person may not speak for or submit information on behalf of the party they are supporting as part of the response and resolution process. When a party is meeting with the Investigator(s), a party may request reasonable breaks to speak with the party's support person. The University may remove or dismiss a support person who becomes disruptive or who does not abide by restrictions on their participation. Additionally, in formal processes involving a live hearing, parties must have a hearing advisor, whose primary role is to conduct cross-examination on behalf of the party. A hearing advisor can be any person of the party's choosing. If a party does not have a hearing advisor, the University will provide one without charge or fee to conduct cross-examination on the party's behalf.

9. Information about how the institution will protect the confidentiality of victims and other necessary parties, including how publicly available recordkeeping will be accomplished without the inclusion of identifying information about the victim, to the extent permissible by law.

In conducting the response and resolution procedures, the University seeks to protect confidentiality to the extent reasonably possible consistent with a thorough, fair and effective investigation and response and as required by applicable laws and UST policies. In all cases, the officials investigating and responding to incidents or allegations of sexual misconduct will share information about the incident or allegation, investigation and response within and outside UST only on a "need to know" basis. The Title IX Coordinator in consultation with Public Safety, Human Resources and/or Dean of Students, as appropriate will assist in determining who has a need to know. The victim's name will not be published by the University in its Clery Act reports or timely warnings. As a private institution subject to the Family Educational Rights and Privacy Act, most University records related to students are treated as confidential and are not publicly available. Any publicly available recordkeeping will be accomplished without the inclusion of identifying information about the victim, to the extent permissible by law.

The University will maintain as confidential any accommodations or supportive measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide accommodations or protective measures. Information about accommodations and supportive measures will be shared on a need-to-know basis, as determined by the Title IX Coordinator, Public Safety, Human Resources and/or Dean of Students.

E. Changes to a victim's academic, living, transportation and working situations or protective measures after an alleged sex offense and of the option for those changes, if those changes are requested by the victim and are reasonably available

If requested by the victim, and if reasonably available, the university is obligated to comply with a student's reasonable request for a living or academic situation change following an alleged offense of stalking, domestic violence, dating violence or sexual assault if the accommodations are reasonably available. Available options may include transferring the victim to a different residence hall or floor within a residence hall, transferring the respondent to a different residence hall or floor within the residence hall, releasing a victim from a housing contract, requiring a respondent to move off campus, switching the victim's class section when another section is reasonably available, switching the respondent's class section when another class section is reasonably available, issuing a mutual no-contact order, and limiting the Respondent's access to campus. Decisions about appropriate interim and protective measures are made by the Response Manager based on all the facts and circumstances, including the following factors: (1) protection of the parties; (2) protection of the broader community; (3) reasonableness of request; (4) age of student(s) involved; (5) severity or pervasiveness of the allegations; (6) continuing effects on both parties; (7) whether the reporting party and responding party share the same residence hall, dining hall, class, transportation or job location; and (8) whether the requested action is reasonably available. The victim does not need to make a report to law enforcement or initiate the Response and Resolution Process before requesting such changes. These measures are designed to (1) restore or preserve equal access to the University's education programs or activities without unreasonably burdening the other party, (2) protect the safety of all parties or the University's educational environment, or (3) deter sexual harassment.

Location of Law Enforcement Agency Information Regarding Registered Sex Offenders

The Federal Campus Sex Crimes Act, effective October 28, 2002, requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a state regarding registered sex offenders may be obtained. The Campus Sex Crimes Act also mandates that sex offenders who are already required to register in a state to provide notice of each institution of higher education in that state at which the person is employed, carries on a vocation, or is a student.

The Minnesota Bureau of Criminal Apprehension administers a predatory offender registration and tracking program. Any questions regarding the program may be directed to the Predatory Offender Unit at (888) 234-1248 or (651) 793-7070. Information regarding this program can be found at the following website:

https://por.state.mn.us/

Information regarding registered sex offenders may be obtained through the St. Paul Police Department (SPPD). The SPPD may be contacted at (651) 266-5685. General information on :etis registration requirements and notification procedures can be found at the following web

https://www.stpaul.gov/departments/police/administration-office-chief/major-crimes-division/family-sexual-violence-unit-1

Information regarding registered sex offenders may be obtained through the Minneapolis Police Department (MPD). The MPD may be contacted at (612) 673-3081. General information on : registration requirements and notification procedures can be found at the following web site.

https://www.minneapolismn.gov/resident-services/public-safety/police-public-safety/police-reports-and-data-requests/sex-offender-community-notification/

In addition, information regarding registered sex offenders may be obtained through the Minnesota Department of Corrections at (651) 642-0200. An offender locator, for offenders that have the highest risk for re-offense, can be accessed from the Minnesota Department of Corrections' web site:

https://coms.doc.state.mn.us/publicregistrantsearch/

Lastly, the Dru Sjodin National Sex Offender Public Website (NSOPW), coordinated by the U.S. Department of Justice, is a cooperative effort between local and state jurisdictions hosting public sex offender registries and the federal government and is offered free of charge to the public

http://www.nsopw.gov/

Alcohol and Drug Policies

Please follow the attached link tofi nd the university's policy regarding possession, use, and sale of alcoholic beverages and enforcement of State underage drinking laws, and regarding the possession, use, and sale of illegal drugs and enforcement of Federal and State drug laws. This policy is enacted in compliance with the federal Drug-Free Schools and Communities Act of 1989 and the Drug-Free Workplace Act of 1988. The University of St. Thomas seeks to foster moral responsibility and a culture of care that supports the well-being of all community members. https://www.stthomas.edu/about/departments/general-counsel/policy-pdfs/alcohol-and-drug-free-university-policy.pdf (see Attachment D)

Emergency Response and Evacuation

To see The University of St. Thomas' policy regarding the response and evacuation procedures. See **Attachment E** for further information.

(1) For a description of the procedures the University of St. Thomas will use to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees on the campus Reference Attachment E.

(2) A description of the process the University of St. Thomas will use to determine if there is a risk to the campus community:

- **(i)** Confirm that there is a significant emergency or dangerous situation as described in paragraph (g)(1) of this section.
- **(ii)** Determine the appropriate segment or segments of the campus community to receive a notification.
- **(iii)** Determine the content of the notification.
- **(iv)** Initiate the notification system.

(3) A statement that the University of St. Thomas will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

(4) A list of the titles of the person or persons or organization or organizations responsible for carrying out the actions described in **Attachment E**.

(5) The University of St. Thomas' procedures for disseminating emergency information to the larger community.

(6) The University of St. Thomas' procedures to test the emergency response and evacuation procedure on at least an annual basis.

- **(i)** Tests that may be announced or unannounced.

(ii) Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year.

(iii) Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced.

The following tabletop exercise were conducted unannounced:

April 12, 2023 – Active Shooter Tabletop Exercise
March 7th, 2024 - Fire / Hazmat Emergency Response / protocol Review
April 22nd, 2024 – University Action Response Team semi-annual Exercise
April 30th, 2024 – University Action Response Team, Campus Protests (Mini-UART activation)
May 14th,2024 - Business Office, General / emergency operations review
June 11th, 2024 - Fair School evacuation exercise
July 23rd, 2024 - ITS, EM Presentation and Active Shooter review
August 20th, 2024 – Center for Well Being Active shooter exercise
September 19th, 2024 - "Discussion Based Exercise / Review of Protocols"
October 4th, 2024 - Robbery prevention tabletop with Campus stores
The following tabltop exercises were announced:
January 10th, 2025 - Minneapolis PD/ St. Thomas TableTop
February 28th, 2025 - Mini University Action Response Team tabletop
April 14th, 2025 - Full University Action Response Team tabletop
July 31st, 2025 - Daughtery Family College tabletop
August 5th, 2025 - Mini University Action Response Team Function with US Army Hazmat
September 22nd, 2025 - Campus Ministry tabletop
November 17th, 2025 University Action Response Team tabletop
December 8th, 2025 - Mini Univeristy Action Response Team

We also conduct two unannounced emergency evacuation drills each year in student residence facilities. They might be announced if needed due to safety concerns.

We also conduct an unannounced test of our emergency notification system twice a year.

Missing Student notification Procedures

If a member of the university community has reason to believe that an on-campus resident student has been missing. They shall immediately notify Public Safety if they have reason to believe that a student who resides in on-campus housing has been missing for 24 hours or has been missing for less than 24 hours under concerning circumstances, including but not limited to: the person's medical condition, the location where the person was last seen, weather, possibility that the person is a potential victim of foul play, or reasons to believe the person may be a danger to themselves or others.

Any student, faculty or staff member who has concerns that a student who resides off campus may be missing are strongly encouraged to immediately notify Public Safety and/or local police.

To report a missing person to St. Thomas, call the Public Safety emergency line: 651-962-5555.

A person making a report should try to provide as much information as possible about the missing student, including (if known) name, age, and address, date, time and location the missing person was last seen, medical condition, any physical or intellectual disabilities, any circumstances related to the person's absence and a physical description.

Under federal law, the University of St. Thomas is required to give resident students the opportunity to provide confidentially the name and telephone number of person(s) that can be contacted should they be determined to be missing from campus. St. Thomas asks all students to provide this confidential contact information when registering for class, as part of the address verification process. In addition, resident students are also notified of this opportunity by the Department of Residence Life at the beginning of each semester.

Students can provide or change this information by logging into the Murphy Online Information System, visiting the "Personal Information" section and then adding or updating their "Missing Person Contact/s."

The contact information provided pursuant to this section will be confidential, will be accessible only to authorized campus officials and may not be disclosed except to law enforcement personnel in the furtherance of a missing person investigation. The request for the confidential contact is different than the emergency contact request even though the names supplied by the student may be the same.

For more information please see attachment F

University of St. Thomas Hazing Policy Statement

The University of St. Thomas unconditionally prohibits hazing in any form and is committed to fostering a safe, respectful, and inclusive community. Hazing—defined as any act that humiliates, intimidates, demeans, or endangers the health or safety of an individual seeking to join or participate in a group or organization—is strictly forbidden, whether on or off campus.

Prevention and Awareness

St. Thomas actively promotes hazing prevention through annual research-based trainings for student-athletes, club sports, and student organizations. Advisors and student leaders are required to review hazing prevention materials, and hazing policies are reinforced through university codes of conduct, handbooks, and public postings.

Reporting Hazing

Any student, employee, or community member who experiences, observes, or suspects hazing should report it immediately to the Dean of Students Office, Public Safety, or through the anonymous tip line (PSTIPS@stthomas.edu or 651-962-TIPS). Reports may also be made directly to law enforcement. St. Thomas prohibits retaliation against anyone who reports hazing in good faith.

Investigation Process

Reports of hazing are promptly reviewed by the Dean of Students or designee. If warranted, a fact-finding investigation is conducted using a "preponderance of the evidence" standard. Sanctions may include warnings, suspension, expulsion, or loss of recognition for organizations. Appeals may be submitted to the Vice President for Student Affairs.

Applicable Laws

Hazing is a violation of Minnesota Statute 135A.155, which requires all colleges to adopt and publicly post a hazing policy.

For more information please see Attachment G

Annual Fire Safety and Log Report 2025

Fire Statistics

Fire 1

Residential Facility	2175 Grand Avenue
Total Fires in Building	1
Fire Number	1
Date	03/01/2025
Time	1611
Cause of Fire	Washing machine
Injuries Requiring Treatment	0
Deaths	0
Property Damage	0.00
Case Number	Initial Complaint Report 25-00156

Fire 2

Residential Facility	Dowling Residence Hall
Total Fires in Building	1
Fire Number	1
Date	09/05/2025
Time	1550
Cause of Fire	Electrical outlet
Injuries Requiring Treatment	0
Deaths	0
Property Damage	0.00
Case Number	Initial Complaint Report 25-00700

Fire 3

Residential Facility	Flynn Residence Hall
Total Fires in Building	1
Fire Number	1
Date	11/23/2025
Time	2201
Cause of Fire	Electrical cord
Injuries Requiring Treatment	0
Deaths	0
Property Damage	0.00
Case Number	Initial Complaint Report 25-01030

No other residence halls had reports of fires.

Description of Each On-Campus Housing Fire Safety System

Residence	Alarm System	Fire Sprinkler System	Portable Extinguishers / Fire Drills

Brady Residence Hall	PSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Dowling Residence Hall	PSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Flynn Residence Hall	PSD/HD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Grace Residence Hall	PSD/HD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Ireland Residence Hall	PSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Morrison Hall	PSD/HD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Murray Residence	PSD/DSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/22/2025 12/13/2025
St. Paul Seminary/School of Divinity: Seminary Residence	This property owned and operated by Archdiocese of St. Paul and Minneapolis (PSD/DSD/PSSA) Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/21/2025 10/22/2025
St. John Vianney Seminary	PSD/DSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/21/2025 10/22/2025
2171 Grand Avenue	PSD/PSSA Test: May/June 2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2175 Grand Avenue	PSD/PSSA Test: May/June 2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2085/2087 Grand Avenue (Residence Life-2012)	PSD/PSSA Test: May/June 2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2109 Grand Avenue (Men’s Transfer)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2110 Summit Avenue (Women's Transfer)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2151 Grand Avenue(Sophomore Experience)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2154 Summit Avenue (Residence Life-2012)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2156 Summit Avenue (Residence Life-Back in service 2023)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2166 Summit Avenue (Residence Life-2012)	PSD/PSSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2139 Grand Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2143 Grand Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2144 Summit Avenue (Residence Life-2012)	PSD/PSSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2159 Grand Avenue (Residence Life-2016)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025

2163 Grand Avenue (Residence Life-2016)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2174 Summit Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2140 Summit Avenue (Residence Life-2023)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
2150 Summit Avenue (Residence Life-2023)	PSD Test: 03/2025	N/A Test: N/A	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/18/2025 10/28/2025
Mary and Gene Frey Hall	PSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 04/01/2025 10/27/2025
Schoenecker Hall North	PSD/PSSA Test: May/June 2025	Yes Test: May/June 2025	Yes Testing: 06/01/2025– 07/01/2025 Fire drills: 03/22/2025 12/13/2025

Abbreviations: PSD - Photoionization smoke detector; PSSA - Pull station single action; HD - Heat Detector; DSM - Duct smoke detector.

Annual Fire Safety and Log Report 2024

Fire Statistics

Fire 1

Residential Facility	Morrison Hall
Total Fires in Building	1
Fire Number	1
Date	11/27/2024
Time	0045
Cause of Fire	Firework mortar
Injuries Requiring Treatment	0
Deaths	0
Property Damage	
Case Number	Initial Complaint Report 24-00990

No other residence halls had reports of fires.

Description of Each On-Campus Housing Fire Safety System

Residence	Alarm System	Fire Sprinkler System	Portable Extinguishers / Fire Drills
Brady Residence Hall	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Cretin Residence Hall	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 *
Dowling Residence Hall	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Flynn Residence Hall	PSD/HD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Grace Residence Hall	PSD/HD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Ireland Residence Hall	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Morrison Hall	PSD/HD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 11/20/2024
Murray Residence	PSD/DSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/20/2024 12/14/2024
St. Paul Seminary/School of Divinity: Seminary Residence	This property owned and operated by Archdiocese of St. Paul and Minneapolis (PSD/DSD/PSSA) Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/29/2024 **
St. John Vianney Seminary	PSD/DSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/29/2024 **
2171 Grand Avenue	PSD/PSSA Test: May/June 2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2175 Grand Avenue	PSD/PSSA Test: May/June 2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024

			Fire drills: 04/21/2024 11/21/2024
2085/2087 Grand Avenue (Residence Life-2012)	PSD/PSSA Test: May/June 2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2109 Grand Avenue (Men's Transfer)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2110 Summit Avenue (Women's Transfer)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2151 Grand Avenue(Sophomore Experience)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2154 Summit Avenue (Residence Life-2012)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2156 Summit Avenue (Residence Life-Back in service 2023)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2166 Summit Avenue (Residence Life-2012)	PSD/PSSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2139 Grand Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2143 Grand Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2144 Summit Avenue (Residence Life-2012)	PSD/PSSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: *** 11/21/2024
2159 Grand Avenue (Residence Life-2016)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2163 Grand Avenue (Residence Life-2016)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2174 Summit Avenue (Residence Life-2016)	PSD/PSSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2140 Summit Avenue (Residence Life-2023)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
2150 Summit Avenue (Residence Life-2023)	PSD Test: 03/2024	N/A Test: N/A	Yes Testing: 06/01/2024– 07/01/2024 Fire drills: 04/21/2024 11/21/2024
Schoenecker Hall North	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024- 07/01/2024 Fire drills: 04/20/2024 12/14/2024
Mary and Gene Frey Hall	PSD/PSSA Test: May/June 2024	Yes Test: May/June 2024	Yes Testing: 06/01/2024- 07/01/2024 Fire drills: 04/20/2024 11/20/2024

Abbreviations: PSD - Photoionization smoke detector; PSSA - Pull station single action; HD - Heat Detector; DSM - Duct smoke detector.

Annual Fire Safety and Log Report 2023

Fire Statistics

Fire 1

Residential Facility	Flynn Residence Hall
Total Fires in Building	1
Fire Number	1
Date	02/22/2023
Time	1608
Cause of Fire	Food particles on electric stove
Injuries Requiring Treatment	0
Deaths	0
Property Damage	0.00
Case Number	Initial Complaint Report 23-00136

Fire 2

Residential Facility	Morrison Hall - Garage R2
Total Fires in Building	1
Fire Number	1
Date	11/04/2023
Time	0101
Cause of Fire	Vehicle
Injuries Requiring Treatment	0
Deaths	0
Property Damage	
Case Number	Initial Complaint Report 23-01004

Fire 3

Residential Facility	School of Divinity
Total Fires in Building	1
Fire Number	1
Date	07/05/2023
Time	0838
Cause of Fire	Air filters
Injuries Requiring Treatment	0
Deaths	0
Property Damage	
Case Number	Initial Complaint Report 23-00578

No other residence halls had reports of fires.

Description of Each On-Campus Housing Fire Safety System

Residence	Alarm System	Fire Sprinkler System	Portable Extinguishers / Fire Drills

Brady Residence Hall	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023– 07/01/2023 Fire drills: * 09/18/2023
Cretin Residence Hall	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Dowling Residence Hall	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Flynn Residence Hall	PSD/HD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Grace Residence Hall	PSD/HD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Ireland Residence Hall	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Morrison Hall	PSD/HD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
Murray Residence	PSD/DSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 11/04/2023
St. Paul Seminary/School of Divinity: Seminary Residence	This property owned and operated by Archdiocese of St. Paul and Minneapolis (PSD/DSD/PSSA) Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/14/2023
St. John Vianney Seminary	PSD/DSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/13/2023
2171 Grand Avenue	PSD/PSSA Test: May/June 2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2175 Grand Avenue	PSD/PSSA Test: May/June 2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2085/2087 Grand Avenue (Residence Life-2012)	PSD/PSSA Test: May/June 2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2109 Grand Avenue (Men's Transfer)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2110 Summit Avenue (Women's Transfer)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2151 Grand Avenue(Sophomore Experience)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2154 Summit Avenue (Residence Life-2012)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2156 Summit Avenue (Residence Life-Back in service 2023)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 11/04/2023
2166 Summit Avenue (Residence Life-2012)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2139 Grand Avenue (Residence Life-2016)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2143 Grand Avenue (Residence Life-2016)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2144 Summit Avenue (Residence Life-2012)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * **

2159 Grand Avenue (Residence Life-2016)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2163 Grand Avenue (Residence Life-2016)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2174 Summit Avenue (Residence Life-2016)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023 – 07/01/2023 Fire drills: * 09/18/2023
2150 Summit Avenue (Residence Life-2023)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023- 07/01/2023 Fire drills: * 09/18/2023
2140 Summit Avenue (Residence Life-2023)	PSD Test: 03/2023	N/A Test: N/A	Yes Testing: 06/01/2023- 07/01/2023 Fire drills: * 09/18/2023
Schoenecker Hall North	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023- 07/01/2023 Fire drills: * 11/04/2023
Mary and Gene Frey Hall	PSD/PSSA Test: May/June 2023	Yes Test: May/June 2023	Yes Testing: 06/01/2023- 07/01/2023 Fire drills: * 09/18/2023

Abbreviations: PSD - Photoionization smoke detector; PSSA - Pull station single action; HD - Heat Detector; DSM - Duct smoke detector.

Attachment A

Nondiscrimination and Anti-Harassment Policy

Policy number: 105
Policy owner: Title IX Coordinator and Associate Vice President for Inclusive Excellence

Date of initial publication: October 31, 2022[1]
Date of latest revision: August 5, 2025

SECTION I. PURPOSE

The University of St. Thomas is dedicated to creating and maintaining an inclusive community whose members uphold the highest standards of respect, civility and care for each other. These standards are embodied in the university's mission, convictions and identity as a Catholic university. Consistent with these standards, St. Thomas is committed to the principles of equal educational opportunity and equal employment opportunity.

This policy is intended to clarify the university's prohibition on harassment. It also sets forth expectations regarding the reporting, investigation and resolution of bias incidents, including but not limited to harassment and hate crimes.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to all St. Thomas students, employees (faculty, staff and student workers), applicants for admission and employment, and contractors, volunteers, visitors and licensees. These individuals are referred to as ***covered persons***.

This policy governs all conduct by covered persons. This policy applies regardless of whether the conduct is conducted on-campus, off-campus, or during employment or educational activities.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

a. ***AAUP Principles and Comments*** means the "1940 Statement of Principles and Interpretive Comments" and the "1970 Interpretive Comments" on academic freedom by the American Association of University Professors.

b. ***Bias incident*** means unwelcome conduct that has a negative impact on an individual or group and that one could reasonably conclude is based on an actual or perceived protected characteristic, regardless of whether the conduct is unlawful or violates policy. This definition is used for reporting purposes only.

c. ***Discrimination*** means unfavorable or unfair treatment of an individual or group based on or because of a protected characteristic by a St. Thomas employee, student, program or club,

[1] Replaced Hate Crimes and Bias Motivated Incidents Policy and the Statement on Offensive Behavior

involving any term or condition of employment or any term or condition of an educational program or activity.

d. ***Harassment*** means conduct that has all of the following elements:

- The conduct is unwelcome;
- The conduct is based on a protected characteristic; and
- The conduct unreasonably interferes with someone's ability to participate in or benefit from St. Thomas employment, educational programs or activities, or the conduct creates an intimidating, hostile or offensive work or educational environment.

Further information about harassment is detailed below.

e. ***Hate crime*** means conduct that meets all of the elements of a criminal offense set forth in applicable law and that is motivated in whole or in part by bias based on the protected characteristic of an individual or group.

f. ***Protected characteristic*** means race, color, creed, religion, national origin, sex, sexual orientation, gender identity or expression, familial status, disability, age, marital status, status with regard to public assistance, veteran status, membership or activity in a local commission, genetic information, or any other characteristic protected by applicable law.

g. ***Supervisor*** means a St. Thomas faculty or staff member who directly supervises other employees or whose job responsibilities include supervision of student activities.

SECTION IV. RESPONSIBILITY TO SUPPORT AN INCLUSIVE, NONDISCRIMINATORY ENVIRONMENT

All members of the St. Thomas community are expected to respect and uphold the university's mission, convictions and identity as a Catholic university and to comply with applicable federal and state nondiscrimination laws. Unlawful discrimination is prohibited.

St. Thomas encourages and may require members of the St. Thomas community to participate in training and development opportunities that support an inclusive, nondiscriminatory environment.

SECTION V. HARASSMENT PROHIBITED

St. Thomas prohibits harassment based on an individual's protected characteristic. The determination of whether conduct violates this policy will be based on the totality of the circumstances, as further detailed below.

A. Harassment

1. General Considerations

Harassment is a specific form of discrimination. In order for conduct to be considered harassment by St. Thomas, it must be sufficiently serious that it unreasonably interferes with an employee's ability to perform their job or unreasonably limits or interferes with a student's ability to participate in or benefit from the University's programs and thus creates a hostile work or learning environment. Conduct may be harassment regardless of whether it is verbal, physical or conducted using technology. Examples of conduct that may be considered harassment under this policy include, but are not limited to:

- Using epithets, slurs or offensive jokes based on a protected characteristic.

- Displaying or circulating written materials, objects, videos, audio or pictures that degrade an individual or group based on a protected characteristic.
- Verbal abuse or insults about people in a protected group or directed at an individual because of a protected characteristic.
- Imitating the speech, walk or movement of a person with a disability with the intent to mock or embarrass them.
- Damaging property or engaging in physical violence motivated in any way by a protected characteristic.

In some situations, a single incident of severe conduct may constitute harassment. In other situations, a finding of harassment may require a pattern of conduct. A person's subjective belief that behavior is intimidating, hostile or offensive does not make that behavior harassment. The behavior must be objectively unreasonable, applying St. Thomas' generally applicable behavioral expectations.

Harassment is distinguished from petty slights, annoyances and personal disagreements. Conduct that does not rise to the level of harassment under this policy may nonetheless be inconsistent with the university's convictions and, if continued, may later rise to the level of harassment. Such conduct may be addressed through conversation, education or under other applicable policies.

2. Sexual Harassment

One form of harassment is sexual harassment, which may include sexual assault. The Sexual Misconduct Policy prohibits all forms of sexual harassment and sexual misconduct and governs the process for reporting and responding to reports of sexual harassment. If a covered person has experienced or becomes aware of known or suspected sexual harassment, they should consult the Sexual Misconduct Policy.

3. Hate Crimes

Some conduct that constitutes harassment may also be considered a hate crime under applicable law. It is not the role of St. Thomas to determine whether someone has violated criminal law. However, St. Thomas may address alleged criminal conduct, including hate crimes, under this and other applicable policies and may report such conduct to law enforcement.

B. Academic Environment

The St. Thomas mission and convictions embody the university's strong commitment to the free and full pursuit of truth and knowledge by every member of the St. Thomas community. As an academic institution, St. Thomas actively seeks to foster and facilitate open inquiry and discussion in a manner that is consistent with the university's mission, convictions and the principles of academic freedom. The university's prohibition of harassment is critical to and consistent with this objective. St. Thomas cannot foster open inquiry and discussion in an environment in which harassment and discrimination are tolerated.

It is important to distinguish harassment from discomforts experienced in an arena of free intellectual exchange and disagreement. This is particularly the case in the classroom and other academic settings, where in the course of legitimate intellectual inquiry and debate a student might encounter (or introduce) course materials or comments that are disturbing, challenging or perhaps even offensive to the student's or others' beliefs. Such discomfort does not in and of itself constitute harassment. It is the responsibility of faculty to maintain an atmosphere of open inquiry in the classroom, where differing points of view can be discussed and debated in an atmosphere of mutual

respect and civility. It is the responsibility of students to participate in their own learning process with open-mindedness, receptivity to new ideas and perspectives, and respect and civility towards others. Students who have concerns regarding a comment or discussion in class are encouraged to speak directly to the faculty member. If the student is uncomfortable with the outcome of that discussion, the student may raise the concern with the department chair, program director, dean of the school or college, or the dean of students.

This policy does not circumscribe a faculty member's freedom as part of the faculty member's teaching to select, assign or discuss materials or topics that are legitimately related to the subject being taught. In situations where there are perceived or potential conflicts between (a) the limitations on conduct and communications implied by the definition of discrimination or harassment contained in this policy and (b) the principles of academic freedom, St. Thomas will use as a working definition of academic freedom the AAUP Principles and Comments. When addressing concerns of bias by faculty members, the existence of such a perceived or potential conflict and the appropriate application of the AAUP Principles and Comments will be considered in consultation with the dean of the respective school or college (or, if the dean has a conflict of interest, the provost or vice provost for academic affairs).

SECTION VI. REPORTING BIAS INCIDENTS

St. Thomas is committed to addressing all bias incidents that negatively impact the St. Thomas community, even if the conduct does not rise to the level of a policy violation. Bias incidents vary in degree. Some bias incidents rise to the level of a hate crime or other harassment and violate this policy. Other reported bias incidents do not rise to the level of a policy violation but may still have adverse effects on the St. Thomas community. Conduct that does not rise to the level of a policy violation may be addressed through educational or restorative means.

As further detailed below, St. Thomas requires supervisors to report known and suspected hate crimes, harassment and or unlawful discrimination. St. Thomas strongly encourages reporting of all other suspected bias incidents by or affecting a covered person. **Appendix A** to this policy contains more detailed contact information for making reports.

A. Required Reporting by Supervisors

All St. Thomas supervisors and all members of the St. Thomas Board of Trustees are required to promptly report incidents or allegations of unlawful discrimination, hate crimes or harassment by or against a covered person. Required reports of known or suspected hate crimes should be made directly to Public Safety. Required reports of known or suspected discrimination or harassment by a faculty or staff member should be made directly to Human Resources, the Title IX, ADA and EO Compliance Coordinator, or using the EthicsPoint Hotline. Required reports of known or suspected harassment by a student should be made directly to the Dean of Students Office, the Title IX, ADA and EO Compliance Coordinator, or using the Tell Someone report system. Additional reporting information and contact information is in **Appendix A**.

Required reports must not be made anonymously. This helps assure that St. Thomas has sufficient information to respond appropriately and fulfill its obligations relating to any incident.

St. Thomas faculty, staff and volunteers who have a professional licenses requiring confidentiality of communications with a patient or client (e.g., a law license, psychology license or social work license) are not required to report client or patient information that their professional license requires them to keep confidential.

B. Encouraged Reporting by Other Covered Persons

St. Thomas strongly encourages any person who believes they have experienced or witnessed unlawful discrimination, a hate crime or harassment to make a report. In addition, if a community member or someone they know has been adversely affected by a suspected bias incident, they are encouraged to make a bias incident report, even if they are unsure whether the incident rises to the level of a policy violation.

Suspected hate crimes should be reported to Public Safety and law enforcement. For other bias incidents, there are multiple ways to report. Please see **Appendix A.**

SECTION VII. RESPONSE TO BIAS INCIDENTS

A. Voluntary, Personal Response

An individual who believes they have been or are being subjected to a bias incident, including harassment or other unlawful discrimination, may voluntarily choose to directly address the behavior. In such a situation, the individual is encouraged to clearly explain to the alleged offender as soon as possible after the incident that the behavior is objectionable.

If the behavior does not stop, or if the individual does not want to directly address the offender, the individual is strongly encouraged to report directly to St. Thomas through one of the methods described in this policy.

While direct communication is encouraged when it may effectively resolve an issue, under no circumstances will an individual be required to use personal resolution to address prohibited behaviors, rather than reporting the conduct to St. Thomas for investigation and responsive action.

B. St. Thomas Response

St. Thomas will review all bias incident reports it receives, investigate the reports if needed to gather the relevant facts, and take whatever responsive action it determines appropriate. Details of bias incident reports, investigations and resolutions will be kept confidential to the extent practicable, consistent with the need to investigate and address any adverse impact on the affected individual and broader community. Appropriate administrators may be notified of reports that are likely to have a broader impact on the campus community, including but not limited to the Office for Diversity, Equity and Inclusion.

Due to privacy laws and concerns, St. Thomas may be limited in the information it can share with community members about the details and resolution of a particular bias incident, including reports of harassment and hate crimes. However, the office investigating the matter will strive to provide to the reporting party periodic status updates as appropriate and communication regarding the conclusion of the process. In addition, when other community members are aware of an incident or issue, St. Thomas may respond to community concerns or communicate with the broader community.

SECTION VIII. DETERMINATIONS OF POLICY VIOLATIONS AND SANCTIONS

Violations of this policy may result in disciplinary action up to and including termination of employment or contract, expulsion, withdrawal of an offer of admission or employment, and exclusion from campus. Because conduct that violates this policy may vary in degree, different conduct may result in different kinds of sanctions.

Reported conduct that does not rise to the level of a hate crime or harassment may be addressed through appropriate measures, including but not limited to educational measures, restorative measures, and discipline under other applicable university policies.

SECTION IX. NO RETALIATION

St. Thomas prohibits retaliation against any individual for making a good faith report under this policy, participating as a witness in an investigation of a report, being a party or witness in a legal proceeding resulting from a report, refusing to engage in conduct the individual believes in good faith to be unlawful or a violation of this policy or engaging in other legally protected conduct. Any person who retaliates in violation of this policy will be subject to discipline or sanctions, up to and including termination of employment, expulsion or otherwise ending the individual's relationship with St. Thomas.

Appendix A to Nondiscrimination and Anti-Harassment Policy

Bias Incident Reporting and Response Procedures

Date of initial publication: October 31, 2022
Date of latest revision: August 5, 2025

St. Thomas is committed to the prompt and equitable resolution of reports of conduct that may violate its Nondiscrimination and Anti-Harassment Policy. This document provides additional detail regarding reporting bias incidents, including but not limited to harassment and hate crimes, and the university's response procedures.

SECTION I. CONTACTS FOR MAKING BIAS INCIDENT REPORTS

A. Reporting Hate Crimes to Law Enforcement

St. Thomas strongly encourages individuals who have experienced or witnessed conduct they believe to be a hate crime or other criminal conduct to report the conduct to law enforcement. St. Thomas will assist community members who wish to make a report to law enforcement. Links to reporting information for the City of Minneapolis and the City of St. Paul are below:

- City of Minneapolis Crime Reporting Information
- City of St. Paul Hate Crime Reporting Information

For suspected hate crimes that occur on or near campus, contact Public Safety, which will assist with law enforcement reporting.

B. Reporting Bias Incidents, Including Harassment and Hate Crimes, to St. Thomas

Below are links and contact information for making reports of bias incidents, including harassment and hate crimes, to St. Thomas. In addition to the contacts below, if the incident took place in the classroom, it may also be reported to the department chair or dean of the school or college.

Online Tell Someone reports, EthicsPoint reports, and reports to the Public Safety PSTIPS hotline can be made anonymously. Please keep in mind, however, that anonymous reports often contain insufficient information to follow up with the parties involved, resulting in insufficient evidence to complete a thorough investigation. Accordingly, St. Thomas may not be able to fully investigate an anonymous report.

If the reported conduct involves a potential hate crime and is not made directly to Public Safety, Public Safety will be notified promptly.

- **St. Thomas Tell Someone Reporting System**
  Online at Tell Someone reporting form
  (Any reports)

- **EthicsPoint System**
  Telephone: 1-800-ETHICAL (1-800-384-4225) or online at www.ethicspoint.com
  More information on EthicsPoint is available here.
  (Best for reports by or about faculty and staff)

- **Dean of Students**
  Room 241, Anderson Student Center
  www.stthomas.edu/deanofstudents
  (651) 962-6050
  (*For reports by or about students)*

- **Human Resources**
  Room 217, Aquinas Hall
  www.stthomas.edu/hr
  (651) 962-6510
  (*For reports by or about faculty or staff)*

- **Title IX, ADA and EO Compliance Coordinator**
  Room 241, Anderson Student Center
  title-ix@stthomas.edu
  (651) 962-6882
  (*Any reports*)

- **Department of Public Safety**
  St. Paul: Morrison Hall, 1st Floor
  Minneapolis: School of Law, 1st Floor
  https://www.stthomas.edu/public-safety/department-public-safety/index.html
  (651) 962-5100
  (Best for reports involving safety or security concerns or potentially criminal conduct)

- **Anonymous Public Safety reports:** PSTIPS@stthomas.edu or 96(2-TIPS)

SECTION II. INVESTIGATION AND RESPONSE PROCEDURES

The scope of the university's investigation and response will vary based on the nature of the complaint and other relevant factors. The investigation and response procedures are intended to be flexible to allow St. Thomas to determine how it can best address reports of bias incidents while continuing to advance its educational mission and maintain a nondiscriminatory learning and working environment.

Bias incident reports that relate to the conduct of faculty, staff or student employees generally will be reviewed by the Title IX, ADA and EO Compliance Coordinator, who will consult or collaborate with Human Resources and other administrators, as the Coordinator determines appropriate. Reports that relate to the conduct of students generally will be addressed by the Dean of Students Office following the Student Conduct Code. Public Safety will consult and assist on an as-needed basis and will be involved in all reports that involve a potential hate crime.

UNIVERSITY OF St.Thomas

Sexual Misconduct Policy

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SECTION I. PURPOSE

The University of St. Thomas mission and convictions embody the University's commitment to promote and protect the personal dignity and well-being of every member of the St. Thomas community. Sexual harassment, sexual assault and other forms of sexual misconduct violate that commitment and are not tolerated in our community. Moreover, they constitute unlawful sex discrimination. All forms of sexual misconduct are prohibited by St. Thomas.

The St. Thomas mission and convictions also embody the University's strong commitment to academic freedom, rigorous thinking and the free and full pursuit of knowledge and truth by every member of the St. Thomas community. The prohibition on sexual misconduct is critical to and consistent with these commitments. St. Thomas cannot achieve its educational objectives in an environment in which sexual harassment or other forms of sexual misconduct are tolerated.

This policy defines the forms of sexual misconduct prohibited by St. Thomas, describes reporting options, and identifies the procedures St. Thomas will use to resolve reports of sexual misconduct. This policy reflects the University's commitment to: (1) fostering an environment where sexual misconduct is not tolerated, (2) informing all members of our community about our policy, procedures, and resources, (3) supporting members of the community who experience sexual misconduct and informing them about our policy, procedures, and resources and (4) resolving reports of sexual misconduct in a prompt, impartial and equitable manner.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to all St. Thomas students, employees (faculty, staff and student workers), members of the Board of Trustees, contractors, volunteers, visitors, licensees and participants in any St. Thomas study abroad or other travel program (collectively "Covered Persons").

This policy governs conduct by or against a Covered Person, both on and off the St. Thomas campus.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

a. ***Sexual misconduct*** **i**ncludes sexual harassment, sexual assault (including actual or attempted non-consensual sexual contact and actual or attempted non-consensual sexual penetration), sexual exploitation, dating violence, domestic violence, stalking and other misconduct, as defined in Section IV of this policy.

b. ***Title IX-based sexual misconduct*** is sexual misconduct as defined under federal Title IX regulations and is described in more detail in Section IV.B of this policy.

c. ***Non-Title IX-based sexual misconduct*** is any misconduct described in Section IV of this policy that is not Title IX-based sexual misconduct. Non-Title IX-based sexual misconduct is further described in Section IV.A of this policy.

d. ***Confidential Resources*** are individuals who provide confidential assistance and support to individuals who have experienced or otherwise are involved in sexual misconduct situations. Confidential Resources are not required to notify the Title IX Coordinator or law enforcement about sexual misconduct so long as the allegations do not involve the physical or sexual abuse of a child or vulnerable adult or an imminent threat to the life of any person. In accordance with applicable law, limited categories of individuals may serve as Confidential Resources. Confidential Resources are available both on and off campus. The Confidential Resources available on the St. Thomas campus are:

- counselors in St. Thomas Counseling and Psychological Services;
- health care providers at St. Thomas Health Services; and
- clergy, or other ministers of any religion (e.g. campus chaplains), in the following limited circumstances:
    - A member of the clergy or minister who learns of sexual misconduct through confession to such clergy member or minister, if disclosure is enjoined by the rules and practice of the religious body to which the member of the clergy or minister belongs.
    - A member of the clergy or minister who does not have significant responsibility for student or campus activities other than pastoral counseling and who learns of sexual misconduct in the course of providing confidential pastoral counseling of a professional character, including religious or spiritual advice, aid or comfort. Clergy and other ministers are not Confidential Resources if they are not acting in the professional capacity of a pastoral counselor.

For more information on Confidential Resources, see Part V.B.1.a. Talking to a Confidential Resource.

e. **A *Covered Person*** is a St. Thomas student, employee (faculty, staff or student worker), member of the Board of Trustees, contractor, volunteer, visitor, licensee and/or participant in any St. Thomas study abroad or other travel program.

f. **A *Reporting Party*** is an individual who experiences conduct that they believe is or that may be sexual misconduct prohibited by this policy.

g. **A *Third-Party Reporter*** is an individual, other than a Reporting Party, who notifies an Official with Authority that a friend, a student, a co-worker or another Covered Person experienced conduct that the individual believes is or may be sexual misconduct prohibited by this policy.

h. **An *Official with Authority*** is a University official with the authority to institute corrective measures on behalf of St. Thomas related to sexual misconduct. St. Thomas positions that are considered to be Officials with Authority are identified below. If an individual reports sexual misconduct to one of these Officials with Authority, St. Thomas will be deemed to have knowledge of the report and must take particular steps in accordance with applicable law and this policy.

    i. Title IX Coordinator
    ii. Human Resources Business Partner
    iii. Dean of Students
    iv. Associate and Assistant Deans within the Dean of Students Office
    v. Public Safety supervisors and officers
    vi. President
    vii. Executive Vice President and Provost
    viii. Vice Provost for Academic Affairs
    ix. Associate Vice Provosts
    x. Vice Presidents
    xi. Associate Vice Presidents
    xii. Deans of each St. Thomas school or college
    xiii. Associate and Assistant Deans of each St. Thomas school or college
    xiv. Rector/Vice President of The Saint Paul Seminary School of Divinity

xv. Department chairs and directors of departments, programs, centers, offices and institutes

xvi. Community Directors and Hall Directors in student residence halls

All Officials with Authority must promptly report any information regarding a potential report of sexual misconduct to the University's Title IX Coordinator.

i. **A *Responding Party*** is an individual who is reported to have engaged in conduct that the reporter believes is or may be sexual misconduct prohibited by this policy.

SECTION IV. SEXUAL MISCONDUCT PROHIBITED

The University of St. Thomas is committed to providing a campus environment free of sex- and gender-based discrimination and harassment. Consistent with this commitment, St. Thomas prohibits sexual misconduct and will promptly address any reports of sexual misconduct by or against a Covered Person. Use of alcohol or other drugs does not excuse behavior that violates this policy.

Other forms of sex- and gender-based discrimination are addressed by separate University policies, including but not limited to the Equal Opportunity Statement and Notice of Nondiscrimination. In addition, St. Thomas maintains a separate Consenting Relationships Policy applicable to students, faculty and staff that, depending on the circumstances, prohibits or strongly discourages romantic, intimate or sexual relationships involving persons of unequal power, even when consent is present. Covered Persons are expected to comply with all applicable policies.

This policy addresses two categories of sexual misconduct: Title IX-based sexual misconduct that is defined by federal regulations, and non-Title IX-based sexual misconduct, which covers a broader range of prohibited conduct than is covered by federal regulations. Because of these distinctions, there are some differences in how each category of misconduct is handled by St. Thomas, as described in this Section.

A. Behavior that Constitutes Non-Title IX-Based Sexual Misconduct

1. Sexual Harassment

Sexual harassment is conduct that has all of the following elements:

- The conduct is unwelcome.
- The conduct is based on gender, sex or sexual orientation.
- The conduct unreasonably interferes with, denies or limits someone's ability to participate in or benefit from St. Thomas employment, education programs and/or activities.

Sexual harassment includes both verbal and/or physical conduct. Sexual harassment can be between people of the same gender or between people of different genders. Whether conduct constitutes sexual harassment under this policy will be determined based on the facts and circumstances. A single incident of conduct may constitute harassment depending on the facts and circumstances. In many cases, however, a finding of harassment will require a pattern of unwelcome conduct.

Examples of sexual harassment may include, but are not limited to:

- Punishing a refusal to comply with a sexual request.
- Offering a benefit (such as a grade, employment opportunity or athletic participation) in exchange for sexual favors or other verbal or physical conduct of a sexual nature.

- Repeatedly subjecting a person to unwelcome sexual attention or sexual advances, whether on-line, in person or in any other way.
- Pervasive, inappropriate displays of sexually explicit or sexually graphic content in a workplace or educational environment.
- A pattern of bullying based on gender, sex or sexual orientation.
- Persistent and offensive sexually oriented or sex- or gender-based jokes and comments.
- Other severe or pervasive conduct that creates a hostile work or educational environment.

To the extent not already covered above, the definition includes conduct considered sexual harassment under Minnesota law. *See Minnesota Statutes Section 363A.03, subd. 43*.

Other types of sexual misconduct defined in this policy also may be considered sexual harassment under applicable laws.

Clarification Regarding the Academic Environment

The prohibition of sexual harassment does not circumscribe a faculty member's freedom as part of the faculty member's teaching to select, assign or discuss materials or topics that are legitimately related to the subject being taught. In the classroom and other forums, St. Thomas actively encourages and seeks to facilitate the free expression, challenge and debate of diverse and deeply held beliefs and opinions. Students who have concerns regarding a comment or discussion in class are encouraged to speak directly to the faculty member, the department chair, or the dean of the school or college about the concern.

In situations where there are perceived or potential conflicts between (a) the limitations on conduct and communications implied by the definition of sexual harassment contained in this policy and (b) the principles of academic freedom, St. Thomas will use as a working definition of academic freedom the "1940 Statement of Principles and Interpretive Comments" and the "1970 Interpretive Comments" on academic freedom by the American Association of University Professors ("AAUP Principles and Comments"). When addressing complaints against faculty members, the existence of such a perceived or potential conflict and the appropriate application of the AAUP Principles and Comments will be considered in consultation with the dean of the respective school or college (or, if the dean has a conflict of interest, the provost or provost's designee).

2. Sexual Assault

Sexual assault refers to non-consensual sexual contact or no-consensual sexual penetration, as defined below. Incest and statutory rape are considered forms of sexual assault.

a. Sexual Assault: Non-Consensual Sexual Contact

Non-consensual sexual contact is any intentional touching, however slight, by any person upon the breasts, buttock, groin, genital area or inner thigh (collectively "intimate parts") of any other person, or of such other person's clothing covering these areas, with or by any body part or any object, seminal fluid or sperm with sexual or aggressive intent that occurs in one or more of the following ways:

- by force or coercion;
- without the consent of the other person; and/or
- when the person knows or reasonably should know that the other person is incapacitated, regardless of the reason for incapacitation.

Non-consensual sexual contact also includes causing or inducing a person, without consent, to similarly touch or fondle the intimate parts of oneself or someone else. Activity that constitutes nonconsensual sexual contact under this policy also may constitute criminal sexual misconduct under Minnesota law. *See Minnesota Statutes Section 609.341 et seq*.

b. Sexual Assault: Non-Consensual Sexual Penetration

Non-consensual sexual penetration is any anal or vaginal penetration, however slight, by any object or body part (e.g. penis, tongue, finger) and/or any mouth to genital contact that occurs in one or more of the following ways:

- by force or coercion;
- without the consent of the other person; and/or
- when the person knows or reasonably should know that the other person is incapacitated, regardless of the reason for incapacitation.

Activity that constitutes non-consensual sexual penetration under this policy may also constitute criminal sexual misconduct under Minnesota law. *See Minnesota Statutes Section 609.341 et seq*.

3. Sexual Exploitation

Sexual exploitation occurs when a person takes non-consensual or abusive sexual advantage of another for the person's own advantage or benefit or to benefit or advantage anyone else and that behavior does not otherwise constitute one of the other sexual misconduct offenses.

Examples of sexual exploitation may include, but are not limited to:

- Unauthorized sharing or distribution of digital, video, audio, electronic, visual or other similar image or recording of nudity or sexual activity, including through the use of generative artificial intelligence (AI) This section includes unauthorized sharing or distribution of "deepfake" sexual or nude intimate part depictions (including digital, video, audio, electronic, visual or other similar image or recording) of a person or their likeness that were generated by generative AI or similar means.
- Non-consensual photographing or recording of nudity or sexual activity, whether in digital, video, audio, electronic or other form.
- Going beyond the boundaries of consent (such as letting your friends hide in the closet to watch you having consensual sex).
- Voyeurism (the act of intentionally observing, spying on or listening to one or more person(s) involved in sexual contact or in any state of undress without their consent).
- Exposing one's genitals or inducing another to expose the person's genitals in nonconsensual circumstances.
- Knowingly transmitting a sexually transmitted disease or sexually transmitted infection to another person.
- Possession of child pornography. (Possession of child pornography must be reported immediately in accordance with the University of St. Thomas Policy on Reporting Suspected Child Abuse.)
- Prostituting another person or otherwise engaging in sex trafficking as prohibited under state law. *See Minnesota Statute Section 609.321, subd. 7a*.
- Compelling sexual contact with another person through the use of direct or indirect threats. *See Minnesota Statute Section 609.3458* (sexual extortion).

4. Dating Violence

Dating violence is violence or threats of violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship will be determined based on consideration of the following factors:

- the length of the relationship;
- the type of relationship; and
- the frequency of interaction between the persons involved in the relationship.

Dating violence encompasses a broad range of behaviors. Examples of dating violence may include, but are not limited to:

- Physical harm, bodily injury or assault, including sexual assault.
- Destruction or vandalism of personal property.
- Threats of violence towards the victim, other individuals or animals.

For purposes of this policy, dating violence also includes a pattern of behavior used to coerce, dominate or isolate one's current or former partner in an intimate or romantic relationship. The existence of such a pattern will be determined based on all the facts and circumstances. Examples of behaviors that may be part of such a pattern include, but are not limited to:

- Emotional or psychological abuse.
- Preventing a partner from seeing family or friends.
- Pressuring a partner to quit job or activities.
- Attempts to sabotage a partner's housing, job, education, or club or other organizational involvement.
- Transferring into a partner's class or activities to monitor their behavior.
- Economic coercion or excessive monitoring of a partner's spendin**g.**
- Denying a partner's use of or access to owned or shared assets.

5. Domestic Violence

Domestic violence is a felony or misdemeanor crime of violence committed by:

- the victim's current or former spouse or intimate partner;
- a person with whom the victim shares a child;
- a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner:
- a person similarly situated to a spouse under domestic or family violence law; or
- anyone else against a victim who is protected under applicable domestic or family violence laws.

Domestic violence is prohibited by Minnesota law. *See Minnesota Statutes Section 518B.01 et seq.*

Examples of conduct that constitutes dating violence may constitute domestic violence when it occurs between spouses or persons similarly situated or protected under Minnesota's domestic violence laws. *See Minnesota Statutes Section 518B.01 et seq.*

6. Stalking

Stalking is a course or pattern of two or more acts of unwelcome and unwanted conduct directed towards a specific person that would cause a reasonable person under the circumstances to feel frightened, threatened, oppressed or intimidated or to suffer substantial emotional distress. Stalking is prohibited by Minnesota law. *See Minnesota Statutes Section 609.749.*

Stalking behavior may include, but is not limited to:

- Unwanted and repeated communications by phone, mail, text message, email and/or other electronic communications, including social media.
- Repeatedly leaving or sending the victim unwanted items, presents or flowers.
- Following or lying in wait for the victim at places such as home, school, work or recreational facilities.
- Making direct or indirect threats to harm the victim or the victim's children, relatives, friends or pets.
- Damaging or threatening to damage the victim's property.
- Posting or spreading false or private information about the victim on the internet, in a public place, or by word of mouth.

  Unreasonably obtaining personal information about the victim by accessing public records, using internet search services, hiring private investigators, going through the victim's garbage, following the victim, or contacting the victim's friends, family, work or neighbors.

7. Intimate Partner Violence

Intimate partner violence means any physical or sexual harm or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior against an individual, that may be classified as a sexual misconduct, dating violence, or domestic violence caused by:

(a) a current or former spouse of the individual; or

(b) a person in a sexual or romantic relationship with the individual.

See Minnesota Statutes Section 135A.15, subd. 1a(e).

8. Prohibited Sexual Misconduct Under Minnesota Law

To the extent not already covered in the definitions above, non-Title IX sexual misconduct also includes all conduct defined as "sexual misconduct" under Minnesota's Campus Sexual Misconduct Policy law (Minn. Stat. Sec. 135A.15), including sexual violence, intimate partner violence, domestic violence, sexual assault, sexual harassment, nonconsensual distribution of sexual images, sexual extortion, nonconsensual dissemination of a deepfake depicting intimate parts or sexual acts, sex trafficking, or stalking.

B. Behavior that Constitutes Title IX-Based Sexual Misconduct

Title IX is a federal law that prohibits certain kinds of discrimination based on sex. Federal regulations require universities to address Title IX-based sexual misconduct in particular ways that do not apply to non-Title IX-based sexual misconduct prohibited by St. Thomas. Specifically, federal regulations require St. Thomas to utilize live hearings to adjudicate Title IX-based sexual misconduct under certain circumstances. Additionally, Minnesota law requires St. Thomas to utilize

live hearings when adjudicating sexual misconduct matters involving students. To provide the greatest degree of clarity and equity to community members, St. Thomas follows the same process for Title IX-based and non-Title IX-based sexual misconduct, except that St. Thomas does not utilize live hearings to adjudicate reports of non-Title IX-based sexual misconduct that do not involve a student as either the Reporting Party or Responding Party. Title IX-based sexual misconduct includes the misconduct defined below:

1. ***Sexual harassment*** means conduct on the basis of sex that satisfies one or more of the following:

   An employee of St. Thomas conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct (sometimes referred to as "quid pro quo" harassment);

   Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the University's education program or activity; or

2. ***Sexual assault*** means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. Relevant elements of the definition include the following:

   Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, or by a sex-related object, without the consent of the victim. This includes instances in which the victim is incapable of giving consent because of temporary or permanent mental or physical incapacity (including due to the influence of drugs or alcohol) or because of age. Physical resistance is not required on the part of the victim to demonstrate lack of consent. This definition includes assaults or attempts to commit rape. Victims and offenders may be individuals of any gender.

3. ***Dating violence*** means violence committed by a person –
   - who is or has been in a social relationship of a romantic or intimate nature with the victim; and
   - where the existence of such a relationship shall be determined based on a consideration of the following factors:
     i. The length of the relationship.
     ii. They type of relationship.
     iii. The frequency of interaction between the persons involved in the relationship.

4. ***Domestic violence*** includes violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

5. ***Stalking*** means engaging in a course of conduct directed at a specific person that would cause a reasonable person to
   - fear for their safety or the safety of others; or
   - suffer substantial emotional distress.

C. Terms that Apply to Non-Title IX-Based and Title IX-Based Sexual Misconduct

The following terms shall apply to non-Title IX-based and Title IX-based sexual misconduct, unless otherwise required by law.

1. Consent

Consent is clear conduct or words that indicate a person freely agrees to engage in a sexual act at the time of the act, subject to the following:

- In order to give consent, one must be of legal age.
- Consent must be knowing and voluntary.
- Silence or failing to resist a sexual act does not constitute consent. Lack of a negative response does not constitute consent. Consent is a freely given "yes" (through words or conduct), not the absence of "no."
- A current or previous relationship does not imply consent to a sexual act.
- A person who is asleep or unconscious cannot consent to a sexual act.
- Consent may not be obtained through threats or coercion.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity. A person who would like to initiate a new form of sexual activity is responsible for obtaining consent for that form of sexual activity.
- Consent, once given, may be withdrawn at any time. Withdrawal of consent must be clearly communicated through words or conduct. When consent is withdrawn, the sexual activity must stop.
- Consent is not effective if a person knows, or reasonably should know, that the other person is incapacitated, regardless of the reason for incapacitation. (See Incapacitation below).

Although consent does not need to be verbal, verbal communication is the most reliable way to ask for and determine whether consent has been given. The University's definition of consent is an affirmative consent standard.

2. Incapacitation

Incapacitation is the inability to understand the facts, nature or extent of the sexual situation. Stated another way, a person is incapacitated if the person cannot understand the "who, what, when, where, why or how" of the sexual situation. Incapacitation may result from a mental or physical disability or injury, the voluntary or involuntary use of alcohol or other drugs, or other causes. In addition, a person is incapacitated for purposes of this policy if the person is "mentally impaired" as defined by Minnesota law. Under Minnesota law, a person is "mentally impaired" if, as a result of inadequately developed or impaired intelligence or a substantial psychiatric disorder of thought or mood, the person lacks the judgment to give reasoned consent to sexual contact or sexual penetration. See Minnesota Statutes Section 609.341.

Alcohol and other drug use may cause incapacitation. Incapacitation does not describe the mere fact of consuming alcohol or using other drugs. Rather, it describes one of several levels along a continuum of effects of alcohol or other drug use. Specifically, incapacitation describes a level of effect of alcohol or other drug use that is more severe than impairment, being under the influence, drunkenness or intoxication generally, and that is less severe than alcohol poisoning or overdose, which may lead to coma or death.

Whether and how quickly a person moves from a state of general impairment, drunkenness or intoxication to a state of incapacitation due to alcohol or other drug use varies from person to

person, based on a number of factors. These factors may include, without limitation, the rate, timing and amount of alcohol consumption or other drug use, the person's physical size, genetics, whether the person consumed food prior to or while consuming/using the alcohol or other drug, whether the person consumed non-alcoholic beverages along with the alcohol, and whether a person is taking medication.

Under this policy, the determination of whether a person is incapacitated for purposes of determining responsibility for sexual misconduct, will be based on all the facts and circumstances. Due to the differing factors and combinations of factors that may cause a person to become incapacitated, the determination of whether a person is incapacitated should not be based solely on the number of drinks or drugs a person consumes.

For purposes of determining alcohol- or drug-related incapacitation under this policy, it is irrelevant whether the alcohol or other drug use was voluntary or involuntary. In addition, as noted earlier in this section, use of alcohol or other drugs does not excuse behavior that violates this policy.

Warning Signs That a Person May be Incapacitated or May be Approaching Incapacitation

Common signs that should alert a reasonable person that another person *may* be incapacitated or approaching incapacitation due to alcohol or other drug use may include, without limitation:

- Impaired control over physical movements and/or loss of coordination (for example, stumbling, swaying, loss of balance, shaky equilibrium, or difficulty walking or standing);
- Significant confusion regarding circumstances or surroundings (for example, lack of awareness of where one is, how one got there, or who one is with);
- Impaired ability to effectively communicate for any reason (for example, slurred speech, difficulty finding words);
- Repeating the same story or statement multiple times without apparent awareness of the repetition;
- Inability to dress/undress without assistance;
- Inability to perform physical or cognitive tasks without assistance;
- Bloodshot, glassy or unfocused eyes;
- Vomiting; or
- Inability to understand some or all of the following questions: “Do you know where you are?” “Do you know how you got here?” “Do you know what is happening?” “Do you know whom you are with?”

This is not an exhaustive list. Exhibiting one or more of the behaviors listed above does not necessarily demonstrate that a person is incapacitated for purposes of finding a policy violation. Determinations of incapacitation are made based on all the facts and circumstances.

3. Coercion

Coercion is conduct, including intimidation and express or implied threats of physical, emotional or other harm, that is employed to compel someone to engage in sexual activity. Coercion may be physical or verbal. Consent may not be obtained through coercion.

Examples of coercion may include, but are not limited to:

- bullying behavior related to sexual activity or sexual behavior;

- causing the deliberate intoxication or impairment by drugs or alcohol or other drugs of another person for the purpose of engaging in sexual activity;
- conditioning an academic benefit or employment advantage on submission to sexual activity;
- threatening to harm oneself if another does not engage in sexual activity; and
- threatening to disclose sensitive information if the other party does not engage in sexual activity.

In assessing whether coercion was used, the frequency, duration and intensity of the pressure applied will be taken into consideration. Unwelcome pressure for sexual activity that does not rise to the level of coercion may meet the definition of sexual harassment.

4. Force

Force means the infliction, attempted infliction or threatened infliction of bodily harm or the act or threat of any other crime, violent activity or wrongdoing. Force may include the use of physical violence, threats, or intimidation (implied threats). Examples of force include but are not limited to:

- punching, slapping, kicking or pushing;
- restraining another person;
- strangulation;
- brandishing or using any weapon;
- threats to harm a person physically; and
- blocking or preventing access to an exit.

SECTION V. REPORTING OR RAISING CONCERNS ABOUT SEXUAL MISCONDUCT

St. Thomas is committed to investigating, resolving and preventing sexual misconduct. St. Thomas strongly encourages individuals who may have experienced sexual misconduct to tell someone about their experience as soon as possible. As described below, St. Thomas expects faculty, staff and members of the Board of Trustees to notify the Title IX Coordinator when they become aware of conduct that they believe is or reasonably may be sexual misconduct by or against a Covered Person. This ensures that parties will receive timely and appropriate support and information. It also enables St. Thomas to fulfill its commitment to prevent and address sexual misconduct and to comply with applicable law. There are multiple reporting options as further described in Section V.C below.

A. Emergency Reporting

1. On-Campus Emergencies

In St. Paul and Minneapolis, dial (651) 962-5555 (or 2-5555 from any campus telephone) to reach St. Thomas Public Safety, who will direct emergency resources to your campus location.

On the Rome campus, dial 113 from the nearest telephone.

2. Off-Campus Emergencies

In Minnesota or elsewhere in the United States, dial 911 from the nearest off-campus telephone.

On the Rome campus, dial 113 from the nearest telephone. In other study abroad programs, contact the program director or local police.

B. Reporting Options for Individuals Who Have Personally Experienced Sexual Misconduct

1. Where to Make a Report

a. Talking to a Confidential Resource

Individuals who have personally experienced sexual misconduct and wish to keep details of the incident completely confidential or are uncertain whether they wish to pursue the St. Thomas response and resolution procedures described in Section VI of this policy, are urged to contact a Confidential Resource as soon as possible following the incident. Section VII of this policy contains contact information for on-campus and off-campus Confidential Resources.

If you are unsure of someone's duties and ability to maintain confidentiality about a situation, ask the individual before revealing confidential information.

b. Reporting to Law Enforcement

Reporting Parties have the right to report to law enforcement all misconduct that may violate criminal laws, and St. Thomas strongly urges Reporting Parties to make such reports. If a Reporting Party who has experienced potentially criminal sexual misconduct, including sexual assault, dating violence, stalking or domestic violence, wishes to notify law enforcement authorities or file criminal charges, St. Thomas will assist the Reporting Party to do so promptly upon the Reporting Party's request. St. Thomas also recognizes a Reporting Party's right to decline to make a police report.

Upon request by the police or the Reporting Party, St. Thomas Public Safety will provide reasonable assistance to the Reporting Party and police in obtaining, securing and maintaining evidence in connection with sexual misconduct allegations. At the request of the Reporting Party, St. Thomas will share data related to the reported incident with police conducting a criminal investigation to the extent permitted by student data privacy laws.

c. Reporting to St. Thomas

Reports of an incident or allegation of sexual misconduct by or against a Covered Person may be made to St. Thomas by contacting the Title IX Coordinator or another Official with Authority. If an Official with Authority other than the Title IX Coordinator receives a report, the Official with Authority is required to promptly report that information to the Title IX Coordinator. The Title IX Coordinator will assess the report in order to determine processes that may apply and in order to coordinate resources and processes regarding the report on behalf of St. Thomas. Reports may be made directly using the contact information in Section VII or on-line through the Title IX website. The St. Thomas response and resolution procedures described in Section VI of this policy will be initiated when an Official with Authority becomes aware of an incident or allegation of sexual misconduct involving a Covered Person.

d. Anonymous Reporting Option

Any individual may make an anonymous report of sexual misconduct to St. Thomas and may do so without disclosing the reporter's name or the names of the parties to the incident, and without requesting any action. Individuals considering anonymous reporting should be aware that under Minnesota law, St. Thomas is not obligated to investigate a report made anonymously, and anonymous reporting often hinders the University's ability to investigate and respond to the incident, depending on the extent of information provided to St. Thomas. Anonymous reports often contain insufficient information to follow up with the parties involved, resulting in insufficient evidence to complete a thorough investigation. Accordingly, St. Thomas strongly urges individuals to report directly to the Title IX Coordinator.

Anonymous reports may be made by submitting the designated form on the University's Title IX website. Anonymous reports do not fulfill the reporting obligations of faculty, staff, or members of the Board of Trustees, as set forth in Section V.C.1.

Anonymous reports are received by the Title IX Coordinator, who will determine appropriate next steps, including whether there is sufficient information to conduct an investigation, individual or community remedies as appropriate, and compliance with the University's obligations under the Clery Act.

2. When to Make a Report

St. Thomas encourages Reporting Parties to make a report of sexual misconduct as soon as possible to receive information regarding and assistance accessing support resources and processes available for addressing the report.

Reporting Parties are encouraged to notify St. Thomas of an incident regardless of whether the Reporting Party knows the identity of the Responding Party and regardless of whether the Reporting Party wants to proceed with a University response process. If the Reporting Party does not know the identity of one or more Responding Party at the time of the incident or notice to St. Thomas and later learns the Responding Party's identity, the Reporting Party should notify St. Thomas of the Responding Party's identity as soon as possible.

If a report is made more than one (1) calendar year after an incident, the University's ability to respond using the resolution procedures in Appendix A may be limited because as time passes, evidence and witnesses may become unavailable and Responding Parties may leave St. Thomas, making it difficult for St. Thomas to respond in an effective and equitable manner. Incidents reported after the passage of more than one year will be addressed at the discretion of St. Thomas based on the availability of witnesses and other evidence and the University's interest in providing a safe, non-discriminatory learning and working environment. Information and support resources will be offered to a Reporting Party regardless of when the report is made.

3. Considerations When Making a Report

a. Confidentiality

Reporting Parties may discuss incidents of sexual misconduct in complete confidence with a Confidential Resource. Other St. Thomas faculty and staff, other than student workers, who become aware of incidents or allegations of sexual misconduct by or against a Covered Person are expected to contact the Title IX Coordinator promptly after becoming aware of the information. If the Reporting Party requests confidentiality, in most cases the employee may withhold the name and other identifying details regarding the Reporting Party or report when contacting the Title IX Coordinator.

St. Thomas understands and seeks to honor confidentiality requests to the extent it can do so while still fulfilling the University's commitments and obligations relating to reports of sexual misconduct. If a Reporting Party requests confidentiality or does not want St. Thomas to investigate or respond to the incident or allegation, St. Thomas will weigh the request against the seriousness of the alleged misconduct and the University's commitment to address and prevent recurrence of sexual misconduct. This determination will be made by the Title IX Coordinator or designee. The determination may not be made by other Covered Persons.

If St. Thomas determines it has an obligation to investigate and address the incident or allegations, St. Thomas will maintain confidentiality to the extent reasonably possible consistent with a prompt, equitable and impartial investigation and response and resolution, and consistent with applicable laws and St. Thomas policies. In addition, St. Thomas will consider and take steps to address safety

concerns. In all cases, the individuals responsible for investigating, responding to, and adjudicating incidents or allegations of sexual misconduct are permitted to share information about the incident or allegation, investigation and response within and outside St. Thomas only on a "need to know" basis. However, complete confidentiality generally will not be possible due to the University's legal obligation to respond. If a Reporting Party is not sure if they wish to initiate the University response process, they may choose not to initiate a process that could lead to a formal investigation. However, the Title IX Coordinator has discretion and responsibility to determine whether a formal investigation is required based on all available information, and the Title IX Coordinator may determine it is necessary to proceed even if the Reporting Party is not ready to do so. A Reporting Party who wants to maintain absolute confidentiality is encouraged to contact and discuss the information with a Confidential Resource prior to contacting the Title IX Coordinator.

b. Support Resources

St. Thomas and outside organizations offer numerous resources to support individuals who have experienced sexual misconduct. This includes sexual assault advocacy services, which are available through outside organizations. In addition, victims of criminal conduct have rights under the Crime Victims Bill of Rights contained in Chapter 611A of the Minnesota Statutes, including but not limited to the right to assistance from the Crime Victims Reparations Board and the commissioner of public safety. Links to additional information about these rights, and contact information for these support resources, is contained in Section VII of this policy.

c. Amnesty

St. Thomas strongly urges reporting of sexual misconduct and seeks to remove any barriers to making a report or participating in an investigation. A student who reports sexual misconduct in good faith, either as a Reporting Party, as a Third-Party Reporter or as a witness in a fact-finding investigation, will not be subject to disciplinary action under student conduct policies for their own personal consumption of alcohol or other drugs in connection with the reported incident.

C. Reporting by St. Thomas Faculty, Staff and Other Covered Persons

1. Required Reporting by St. Thomas Faculty, Staff and Trustees

St. Thomas strives to be a community free from sexual misconduct. To help St. Thomas meet this goal, all St. Thomas faculty and staff (but not student workers), regardless of whether they are Officials with Authority, and all members of the St. Thomas Board of Trustees, are expected to notify the Title IX Coordinator promptly after becoming aware of an incident or allegation of sexual misconduct involving a Covered Person, unless they meet one of the exemptions in the next paragraph. This report may be made online but may not be made anonymously. The report helps ensure that St. Thomas responds appropriately and fulfills its obligations relating to any incident. Required reporting also enables the Title IX Coordinator to track trends within the community and provide appropriate consultation regarding resources, support, and other questions involving the University's policy and procedures for addressing reports of sexual misconduct. In most cases, any employee or Board member who is not an Official with Authority may withhold the Reporting Party's name and/or other identifying details when contacting the Title IX Coordinator consistent with a request from the Reporting Party.

St. Thomas faculty and staff who learn of sexual misconduct while serving as a Confidential Resource are not required to notify the Title IX Coordinator. In addition, faculty or staff members or Board of Trustee members who have a professional license requiring confidentiality of communications with a patient or client (e.g., a law license, psychology license or social work license) are not required to notify the Title IX Coordinator about information that their professional license requires them to keep confidential.

2. Reporting by Other Covered Persons Encouraged

St. Thomas encourages, but does not require, all other persons who become aware of an incident or allegation of sexual misconduct to promptly report the incident or allegation to the Title IX Coordinator. Before deciding whether to report, St. Thomas encourages such persons to review the confidentiality, amnesty and protection from retaliation provisions set forth in Section V.B.3 of this policy.

D. Clarification Regarding Public Awareness Events and Campus Surveys

St. Thomas supports public awareness events that further campus-wide education and prevention efforts. An individual's comments about an incident or allegations of sexual misconduct at these events will not be considered a report to St. Thomas for the purpose of triggering the response and resolution procedure or a required report by faculty, staff or a member of the Board of Trustees to the Title IX Coordinator.

In addition, St. Thomas may, from time to time, conduct surveys to gauge attitudes about sexual misconduct and awareness of campus resources. These voluntary surveys will contribute to the University's understanding of the campus climate and student safety at St. Thomas. The disclosure of incidents of sexual misconduct in responses to survey questions will not be considered a report to St. Thomas for the purpose of triggering an investigation of a particular incident or a required report by faculty, staff or a member of the Board of Trustees to the Title IX Coordinator.

SECTION VI. OBLIGATIONS OF ST THOMAS COMMUNITY FOLLOWING REPORT

A. Response and Resolution Procedures

When the Title IX Coordinator becomes aware of an incident or allegation of sexual misconduct, the Title IX Coordinator will take steps to initiate the response and resolution procedures described in Appendix A to this policy.

The Title IX Coordinator is responsible for ensuring the uniform and consistent application of this policy and the related procedures and for ensuring incidents and allegations of sexual misconduct by or against a Covered Person are addressed in a timely and appropriate manner. St. Thomas recognizes that each case is unique and reserves the flexibility, at the discretion of the Title IX Coordinator or designee, to authorize departures from the response and resolution procedures as warranted by the circumstances and consistent with state and federal laws and regulations. In addition, the Title IX Coordinator and the officials designated in Appendix A to manage the response and resolution procedures have authority, alone or together, to take reasonable steps to protect the St. Thomas community or any individual member of the St. Thomas community from sexual misconduct, regardless whether such steps are explicitly contemplated in this policy or the related procedures.

In cases involving domestic violence, dating violence, sexual assault and stalking and in other cases involving safety concerns, the safety of the Reporting Party and the community is of primary importance. St. Thomas will consult with the Reporting Party and with other resources to determine, under the particular circumstances, how to conduct the response and resolution procedures in a way that protects the safety of the Reporting Party and the community while promoting accountability for prohibited misconduct. Both during and after the process, if requested by the Reporting Party or at the University's initiative, St. Thomas will assist in shielding the Reporting Party from unwanted contact with the Responding Party, in cooperation with appropriate law enforcement, consistent with Minnesota law.

B. Required Reporting by St. Thomas

Under the Clery Act, St. Thomas has a duty to track and publish information about certain types of sexual misconduct and to report certain information in the University's annual Campus Security Report. Personally identifiable information is kept confidential and will not be published.

Under Minnesota law, St. Thomas has a duty to track and publish certain information about sexual assault and to report certain related statistics on its website and to the Minnesota Office of Higher Education. Personally identifiable information and other data collected by St. Thomas for purposes of complying with this reporting requirement is kept confidential, will not be published except in accordance with Minnesota law, and otherwise is available only to St. Thomas employees whose work assignments reasonably require access.

St. Thomas also is required to issue timely warnings for reports of incidents it becomes aware of that pose a serious and continuing threat to members of the campus community. St. Thomas does not disclose personally identifiable information of Reporting Parties in such warnings, while making every effort to provide enough information for community members to make decisions to help ensure their safety.

C. Treatment with Dignity

Under no circumstances may St. Thomas employees suggest that a Reporting Party is at fault for the sexual misconduct they report or that the Reporting Party should have acted in a different manner to avoid being a victim of sexual misconduct. Moreover, consistent with the University's convictions, all members of the St. Thomas community are expected to treat Reporting Parties, Responding Parties and other parties involved in a sexual misconduct matter with dignity, while also supporting the impartial pursuit of truth and upholding the community's expectation that individuals will be held accountable for personal conduct that is determined to violate this policy.

D. No Retaliation

St. Thomas, and federal and state law, prohibit retaliation against individuals for raising concerns about or making reports of sexual misconduct in good faith. No student, faculty or staff will be reprimanded or retaliated against for notifying St. Thomas about potential incidents of sexual misconduct in good faith or for participating or refusing to participate in a factfinding investigation or hearing related to reports of sexual misconduct. Retaliatory actions include, but are not limited to, threats or actual violence against the person or that person's property, adverse educational or employment consequences, coercion, discrimination, ridicule, intimidation, bullying or ostracism.

St. Thomas will take steps to prevent retaliation and will take strong responsive action if retaliation occurs. Any conduct by a Covered Person that constitutes retaliation or reprisal is subject to disciplinary action, up to and including dismissal, expulsion and prohibition from campus or other St. Thomas activities. Concerns regarding retaliation will be addressed in accordance with applicable St. Thomas policies and procedures addressing retaliation.

St. Thomas may impose sanctions if it determines that an individual knowingly initiated in bad faith a claim of sexual misconduct, knowingly provided false information, or intentionally misled a St. Thomas representative during an investigation of sexual misconduct allegations or a related complaint.

SECTION VII. RESOURCES AND CONTACT INFORMATION

A. Emergency Contacts

24-Hour Emergency On Campus – St. Paul and Minneapolis: (651) 962-5555

24-Hour Emergency Off Campus – St. Paul and Minneapolis: 911

24-Hour Emergency – Rome: General Emergency: 113 and Police: 112

B. Contact Information for Making Reports to St. Thomas

Contact information for the Title IX Coordinator and selected Officials with Authority is provided below. Individuals who are not required to notify the Title IX Coordinator are still encouraged to contact the Title IX Coordinator, who has ultimate responsibility for coordinating the University's response to reports. Selected other Officials with Authority are listed here as helpful points of contact for students, faculty or staff who are required or wish to report.

Title IX Coordinator
Missy Majerus
Room 241, Anderson Student Center or
Room 213, Aquinas Hall
2115 Summit Ave
Saint Paul, MN 55105
(651) 962-6882
Title-IX@stthomas.edu

Dean of Students Office
Room 241, Anderson Student Center
(651) 962-6050
Dean of Students Website

Human Resources Business Partners
Room 217, Aquinas Hall
(651) 962-6510
Human Resources Website

Department of Public Safety
St. Paul: Morrison Hall, 1st Floor
Minneapolis: School of Law, 1st Floor
(651) 962-5100
Public Safety Website

Online Reports: St. Thomas Title IX Website

C. On-Campus Confidential Resources

Counseling and Psychological Services
Center for Well-Being
33 South Finn Street
(651) 962-6750
Counseling and Psychological Services Website

Health Services
Center for Well-Being
33 South Finn Street
(651) 962-6750
Health Services Website

D. Other Campus Support Services and Resources

Sexual Assault Response Information

University of St. Thomas Office for Campus Ministry

University of St. Thomas Employee Assistance Program

Students seeking accommodations for a disability in connection with the response and resolution procedures may contact Disability Resources.

E. Off-Campus Resources

Services offered by off-campus resources are not controlled by St. Thomas and may change without notice to St. Thomas. Individuals are encouraged to contact resources directly for more information about provided services.

Police
St. Paul or Minneapolis: 911
Rome: 112

Sexual Assault Nurse Examiners (SANE) available at area hospitals (Confidential Resources)

Regions Hospital (Confidential Resource)
640 Jackson St., St. Paul, Minnesota 55101
(651) 254-3584

United Hospital Emergency Room (Confidential Resource)
333 North Smith Avenue
St. Paul, Minnesota 55102
(651) 241-8755 (direct connection to the Emergency Room)

Hennepin County Medical Center Emergency Room (Confidential Resource)
701 Park Avenue
Minneapolis, Minnesota 55415
Sexual Assault Resource Service: (612) 873-5832

Outside the United States:

Pathways to Safety International (Confidential Resource)
crisis@pathwaystosafety.org

Sexual Assault & Sexual Harassment

RAINN (Rape, Assault, and Incest National Network) (Confidential Resource)
Available anywhere in the United States
1 (800) 656-6673
24-hour hotline; free and confidential

Online Chat available on RAINN's website

SOS: Sexual Violence Services of Ramey County (Confidential Resource) St.
Paul, Minnesota
(651) 266-1000
24-hour hotline; free and confidential

Sexual Violence Center- SVC (Confidential Resource)
Minneapolis, Minnesota
(612) 871-5111
24-hour hotline; free and confidential

Dating Violence, Domestic Violence & Stalking

Domestic Abuse Intervention Project (Confidential Resource) St.
Paul, Minnesota
(651) 645-2824
24-hour crisis line; free and confidential

Day One Services (Confidential Resource)
1 (866) 223-1111
Crisis support, information on shelters, safety planning, and orders for protection

Cultural & Community Specific Support Services

OutFront Minnesota
24-hour anti-violence crisis support line for LGBTQ victims
1-800-800-0350, option 3

Casa de Esperanza
St. Paul, Minnesota
(651) 772-1611 24-Hour Bilingual (English and Spanish) helpline

There are many other culturally specific support services in Minnesota. Please contact the Title IX Office for additional resources.

F. Crime Victim Services and Legal Information

Minnesota Crime Victims Bill of Rights
Under Minnesota law, crime victims, including victims of dating and domestic violence, stalking and sexual assault, have a number of rights, including the right to assistance from the Crime Victims Reparation Board and the commissioner of public safety. The Crime Victims Bill of Rights is available online. The Minnesota Department of Public Safety provides an on-line list of Minnesota Resources for Crime Victims.

Bridges to Safety
Ramsey County Service Center for victims of dating & domestic violence
(651) 266-9901
Provides legal advocacy, legal consultation and assistance filing orders for protection.

Domestic Abuse Service Center (for victims of domestic violence and dating violence)
Hennepin County Government Center
Rm. #A-0650 (lower level)
300 S. 6th Street
Minneapolis, MN 55487
(612) 348-5073

Minnesota Office of Justice, Crime Victims Programs
Monday - Friday, 8:00 AM – 4:30 PM
(651) 201-7300 or 888-622-8799, ext. 1 for financial help

(800) 247-0390, ext. 3 for information and referral
(651) 205-4827 TTY

Ramsey County Victim/Witness Services
Ramsey County Attorney's Office
(651) 266-3222

Hennepin County Victim Services
Hennepin County Attorney's Office
(612) 348-4003

Law Help MN
Legal information on a variety of sexual assault issues

Volunteer Lawyers Network
(612) 752-6655

Minnesota State Bar Association Find a Lawyer Directory

U.S. Embassy in Rome
Telephone: 06 46741

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

G. Resources at Other Institutions

If students who have experienced sexual misconduct transfer to another institution, the University's Title IX Coordinator can assist them in obtaining information about available resources for sexual misconduct victims at that institution. Students who would like such assistance should contact the Title IX Coordinator.

UNIVERSITY OF St.Thomas

Appendix A to Sexual Misconduct Policy

Response and Resolution Procedures

Date of initial publication: June 10, 2014
Date of latest revision: February 25, 2026

St. Thomas is committed to the prompt, impartial and equitable resolution of reports of sexual misconduct that may violate University policy. This document explains the internal procedures St. Thomas generally follows to investigate and adjudicate such reports. These provisions are intended to be flexible so as to allow St. Thomas to fulfill its educational mission and maintain a safe, nondiscriminatory learning and working environment. The Title IX Coordinator or designee has discretion to authorize departures from these provisions when warranted by the circumstances. These procedures are not intended to replicate or replace the process followed by law enforcement or the courts in connection with alleged violations of criminal law.

As described in the Sexual Misconduct Policy ("policy"), federal regulations require St. Thomas to follow certain processes when responding to Title IX-based sexual misconduct, which includes some, but not all of the sexual misconduct prohibited by St. Thomas. Additionally, Minnesota law requires St. Thomas to follow certain processes for all sexual misconduct matters where a student is either the Reporting Party/Complainant or Responding Party/Respondent. St. Thomas has determined that it can provide the greatest degree of clarity and equity to community members by generally using the same procedures to respond to both Title IX-based and non-Title IX-based sexual misconduct, except that St. Thomas does not use live hearings to adjudicate reports of non-Title IX-based sexual misconduct that do not involve a student as either a Reporting Party/Complainant or Responding Party/Respondent.

SECTION I. DEFINITIONS

The definitions used in the policy also apply to these procedures, along with the additional definitions set forth in these procedures.

a. ***Actual knowledge*** means notice of sexual harassment or allegations of sexual harassment to the Title IX Coordinator or an Official with Authority, which includes, but is not limited to, a report of sexual harassment. This standard is not met when the only Official with Authority who has actual knowledge is the Responding Party. Notice to a faculty or staff member who is not an Official with Authority is not sufficient to meet this standard. Only notice to the Title IX Coordinator or another Official with Authority is sufficient to meet this standard.

b. ***Education program or activity*** includes locations, events, or circumstances where St. Thomas exercises substantial control over the Responding Party and the context in which the sexual harassment occurred. This generally includes all buildings and physical spaces owned and/or operated by St. Thomas and all off-campus St. Thomas-sponsored events.

c. ***Supportive measures*** are non-disciplinary, non-punitive individualized services offered as appropriate and as reasonably available without fee or charge to the Reporting Party or Responding Party before or after the filing of a Formal Complaint, or where no Formal Complaint has been filed. These measures are designed to (1) restore or preserve equal access to the University's education programs or activities without unreasonably burdening

the other party, (2) protect the safety of all parties or the University's educational environment, or (3) deter sexual harassment.

d. A ***Report*** is an informal oral or written statement by a Reporting Party or by a Third-Party Reporter that alleges sexual misconduct by or against a Covered Person. A Report may be resolved through provision of supportive measures to the Reporting Party, or through the Alternative Resolution Process or the Formal Process.

e. A ***Formal Complaint*** is a formal written statement, signed and submitted by a Reporting Party or signed by the Title IX Coordinator, alleging sexual misconduct (as defined under the policy) against a Responding Party and requesting that St. Thomas investigate the allegation of sexual misconduct or otherwise address it through an alternative resolution process. Formal Complaint forms are available on the University's Title IX website or in the Title IX Coordinator's office. A Formal Complaint may be filed with the Title IX Coordinator in person, by mail, or by email, by using the contact information listed for the Title IX Coordinator. A Complaint must be submitted in order to initiate the Formal Process. In order for a Formal Complaint to be actionable as Title IX-based sexual misconduct, the Reporting Party must be participating or attempting to participate in a St. Thomas education program or activity at the time the Formal Complaint is submitted by the Reporting Party or signed by the Title IX Coordinator.

f. The ***Response Manager*** is the designated St. Thomas employee responsible for timely coordinating the University's response to a Report or Formal Complaint, managing the response and resolution process in accordance with the policy and these procedures, and determining interim measures. The Response Manager also is available to answer questions the parties may have about the policy or these procedures. The Response Manager is the Title IX Coordinator or a designee of the Title IX Coordinator.

g. A ***Support Person*** is any person a party chooses to accompany them to meetings or proceedings with St. Thomas officials related to a Report or Formal Complaint of sexual misconduct.

h. A ***Hearing Advisor*** is a party's advisor of choice who attends the hearing at the invitation of the party, can assist with formulating questions to the other party or witnesses at the hearing and conducts cross-examination on behalf of the party at the live hearing portion of the formal process. This individual may or may not have served as the party's Support Person at previous meetings If a party does not have an advisor present at the live hearing to serve as Hearing Advisor, St. Thomas will select and provide a University-appointed Hearing Advisor to conduct cross-examination on behalf of that party. St. Thomas will not charge a party a fee for a Hearing Advisor selected and provided by the University.

i. The ***Formal Process*** is the response and resolution process described in Section VI below.

j. The ***Alternative Resolution Process*** is the response and resolution process described in Section V below and is an alternative to the Formal Process.

k. ***Investigator(s)*** are internal or external individuals assigned by the Response Manager under the Formal Process. The role of the Investigator(s) is to conduct a prompt and impartial investigation of a Formal Complaint and to provide a recommendation or determination, depending on the process, regarding whether the Responding Party is responsible for a policy violation.

l. ***Preponderance of the Evidence*** is the standard used by St. Thomas to determine whether a Responding Party is responsible for a policy violation. The Preponderance of the Evidence standard also is referred to as a "more likely than not" standard. The standard requires an appointed hearing panel to consider the relevance and reliability of all the evidence, facts and circumstances known to the hearing panel and to determine whether it is more likely

than not that the Responding Party is responsible or not responsible for a policy violation. The Investigator(s) will also utilize the Preponderance of Evidence standard to make their recommendation regarding responsibility to the hearing panel. and when making determinations of responsibility in cases that are not referred to a hearing panel.

SECTION II. SCOPE AND APPLICATION

These procedures will be initiated when an Official with Authority has actual knowledge of a Report or Formal Complaint of sexual misconduct:

- where the Reporting Party and the Responding Party are both Covered Persons; or
- where the Responding Party but not the Reporting Party is a Covered Person and the alleged incident occurred on the St. Thomas campus or in connection with a St. Thomas education program or activity.

In other situations where a Reporting Party or Responding Party is a Covered Person, the Title IX Coordinator may determine, in the Title IX Coordinator's discretion, whether these procedures or another process is the best way to address the Report or Complaint.

If the Title IX Coordinator is notified of allegations of sexual misconduct that, even if true, would not rise to the level of a policy violation, these procedures do not apply, and the Title IX Coordinator will handle the matter in the Title IX Coordinator's discretion, consistent with any other applicable St. Thomas policies and procedures.

Unless otherwise confirmed in writing by the Title IX Coordinator, these procedures apply to reports or complaints of sexual misconduct submitted on or after the date of the latest policy revision indicated on page 1 of the policy. For reports or complaints submitted prior to that date, the version of the procedures in effect at the time of the report or complaint will apply, unless the Title IX Coordinator confirms in writing that a different version governs.

SECTION III. CONFIDENTIALITY

Reporting Parties and Responding Parties have the right to speak or otherwise share information about Reports and Formal Complaints by or against them and the related response and resolution process. However, both parties must ensure that their communications are consistent with the nonretaliation provision of the policy, other applicable St. Thomas policies including but not limited to student conduct policies, and any agreements between the parties or with St. Thomas. Other individuals involved in the response and resolution process, including witnesses, Support Persons, St. Thomas employees and other Covered Persons who are not parties, are expected to maintain the confidentiality of information related to Reports and Formal Complaints and the response and resolution process consistent with all applicable St. Thomas policies. St. Thomas employees may communicate such information only to individuals who have a legitimate need to know the information in connection with their work responsibilities or their role in the response and resolution process.

SECTION IV. INITIATION OF RESPONSE AND RESOLUTION PROCESS

A. Notice to the Title IX Coordinator and Response Manager

The Official with Authority (if not the Title IX Coordinator) must notify and share the Report or Formal Complaint with the Title IX Coordinator promptly upon receipt of the Report or Formal Complaint. The Title IX Coordinator will serve as the Response Manager for the Report or Formal Complaint or will appoint a trained designee to serve as the Response Manager and will share the

Report or Formal Complaint with the Response Manager. Potential conflicts of interest that are known to St. Thomas and the ability of an individual to timely and adequately manage the procedures for a particular matter will be considered in designating a Response Manager.

B. Initial Meeting with the Reporting Party

Promptly following receipt of a Report or a Formal Complaint, the Response Manager or a designee of the Response Manager will offer to meet with the Reporting Party. During any such meeting, the Response Manager will do the following:

1. Share with the Reporting Party an oral or written summary of the Reporting Party's description of the incident based on the information then known to the Response Manager to confirm the summary is accurate from the Reporting Party's perspective. Gather information from the Reporting Party as necessary to reasonably advise or support the Reporting Party with respect to the response and resolution process and seek to determine, if possible, whether or not the reported information is a report of Title IX-based sexual misconduct, non-Title IX-based sexual misconduct, or neither. Such determination may or may not be possible in this initial meeting. Offer the Reporting Party the opportunity to review the University's record of the Reporting Party's description of the incident, at this or a subsequent meeting.

2. Inform the Reporting Party about available resources and supportive measures to support the Reporting Party. In particular, the Response Manager or designee will provide information about:
    - resources on seeking medical treatment and information on preserving forensic and other evidence;
    - the Reporting Party's right to contact law enforcement and pursue criminal and/or civil remedies outside St. Thomas and available assistance from St. Thomas in making a report to law enforcement;
    - immediate support and assistance available through on- and off-campus resources, including contact information for campus and local advocacy, counseling, health, mental health and legal assistance services;
    - the availability of supportive measures from St. Thomas regardless of whether the Reporting Party chooses to file a Formal Complaint or otherwise participate in the University's response and resolution process; and
    - information about the opportunity to seek a harassment restraining order or order for protection from a Minnesota court in appropriate circumstances.

3. Review the policy and these procedures and available resources with the Reporting Party, specifically noting:
    - The difference between Title IX-based sexual misconduct and non-Title IX-based sexual misconduct, and the impact of that determination on process options;
    - the Reporting Party's options to pursue the Formal Process or the Alternative Resolution Process, or neither, regardless of whether the Reporting Party made a report to law enforcement;
    - the process for filing a Formal Complaint;
    - the confidentiality provisions of the policy;

- in student cases, the University's general practice regarding parental notification, noting that parents and guardians are generally not notified about the investigation without student consent and encouraging students to inform their parents/guardians about the investigation;
- that participation in the response and resolution process is voluntary and noting the potential consequences of non-participation;
- the timing and deadlines for taking action under the policy;
- the prohibition on retaliation for good faith reporting of sexual misconduct allegations and for participating in the response and resolution process; and
    - the ability of St. Thomas to put in place supportive measures to protect the safety of all parties and the educational environment, or to deter sexual harassment.

4. Discuss whether the Reporting Party has concerns about any potential conflicts of interest or bias that could affect the process.

5. Invite and address the Reporting Party's questions about the policy and the response and resolution procedures.

6. Ask the Reporting Party how the Reporting Party wishes to proceed, both regarding the process and regarding supportive measures. Notify the Reporting Party that if the Reporting Party chooses not to pursue the Alternative Resolution Process or Formal Process, St. Thomas will consider whether to take action independently, and that if the Reporting Party chooses to pursue the Alternative Resolution Process, St. Thomas will assess whether to initiate the Formal Process independently based on the facts and circumstances known to St. Thomas.

7. Discuss any anticipated follow-up the Reporting Party might expect from St. Thomas.

C. Initial Assessment and Action to Protect the Community

After receiving a Report or Formal Complaint, the Response Manager will make an initial assessment of the reported information, including the nature and circumstances of the Report or Formal Complaint. The Response Manager may consult with other St. Thomas officials as appropriate and may seek to gather additional information to assess possible supportive measures and next steps.

1. Supportive Measures Determined by St. Thomas

The Response Manager, in consultation with appropriate administrators and informed by the wishes of the Reporting Party, will consider whether and which supportive measures are reasonably necessary or appropriate to restore or preserve equal access without unreasonably burdening the other party, including measures designed to protect the safety of all parties and the broader St. Thomas community, or deter sexual harassment. If the Response Manager and appropriate administrators determine that certain supportive measures are reasonably necessary and appropriate, they are authorized to take or direct such action. Examples of supportive measures include, without limitation:

- Offering counseling services;
- Allowing for deadline extensions or other course-related adjustments;

- Establishing a mutual "no contact" directive prohibiting the Responding Party and Reporting Party from communicating with each other.
- Prohibiting a Responding Party from physically entering or being on St. Thomas property.
- Prohibiting a Responding Party from participating in St. Thomas-sponsored events.
- Changing a Reporting Party's or Responding Party's on-campus residence or prohibiting a Responding Party from residing in a St. Thomas residence.
- Changing a Reporting Party's or Responding Party's student or employee status, in consultation with appropriate administrator(s).
- Changing a Reporting Party's or Responding Party's work or class schedule, in consultation with appropriate administrator(s).
- Issuing a timely warning of any reported incident that presents a serious or continuing threat or danger to the community.
- Providing information about orders for protection and harassment restraining orders in appropriate cases.
- Notifying and consulting with appropriate St. Thomas administrators, faculty and staff members as warranted under the circumstances.

Supportive measures will be determined on a case-by-case basis, will be offered and coordinated as needed and equitably to both parties and may also include community-based measures, such as increased security or monitoring of certain areas of campus or training provided to particular community groups. Either party is free to raise concerns regarding supportive measures with the Response Manager. The Response Manager may modify or initiate new or different supportive measures at any point during the response and resolution process based on the Response Manager's determination of how best to protect the parties and the broader St. Thomas community.

If the Response Manager is not immediately available and the Title IX Coordinator, Dean of Students, or Chief Human Resources Officer determines that immediate action is reasonably necessary and appropriate, the Title IX Coordinator, Dean of Students and/or Chief Human Resources Officer is authorized to take or direct such action.

2. Supportive Measures During and After the Process

In addition to any supportive measures initiated by St. Thomas during the resolution process, the Reporting Party may request reasonable supportive measures to help shield the Reporting Party from unwanted on-campus contact with the Responding Party during and after the response and resolution process, even in cases where there was insufficient evidence to establish responsibility of the Responding Party for violating the policy. Such reasonable supportive measures may include a mutual no-contact order from St. Thomas or assistance to the Reporting Party in transferring to alternative classes or University housing, when such classes or housing are available and the transfer is feasible. The Responding Party may request similar reasonable supportive measures to shield the

Responding Party from unwanted on-campus conduct by the Reporting Party. The Response Manager will consider and make determinations with respect to such requests.

3. Consideration of Potential Academic Freedom Issues as Part of Initial Assessment

If the Responding Party is a faculty member alleged to have engaged in sexual harassment of the Reporting Party, the Response Manager will consider, in consultation with the dean of the

respective school or college (or, if the dean has a conflict of interest, with the provost or the provost's designee), whether there is a perceived or potential conflict between (a) the limitations on conduct and communications implied by the definition of sexual harassment under the policy and (b) the principles of academic freedom as defined by the AAUP Principles and Comments.

4. Emergency Removal Process

In certain cases, the Response Manager, in consultation with the Title IX Coordinator and other appropriate St. Thomas officials, will determine that emergency removal of the Responding Party from their educational program or activity or the St. Thomas campus is necessary pending the completion of the resolution process.

In order to determine if an emergency removal is necessary. St. Thomas will conduct an individualized safety and risk analysis. If St. Thomas determines that there is an immediate threat to the physical health or safety of any student or other individual, including the Responding Party, arising from the allegations of sexual harassment, St. Thomas may choose to institute an emergency removal. The Responding Party will be provided notice of this determination and given the opportunity to challenge the decision immediately following the removal.

5. Administrative Leave

For a Responding Party who is a faculty or staff employee, St. Thomas maintains the right to require the Responding Party to take administrative leave when St. Thomas determines it is an appropriate action under the circumstances. Administrative leave may not be utilized unless a Formal Complaint has been filed and a response process initiated.

D. Determination of Whether to File Formal Complaint

A Reporting Party may decide whether or not to file a Formal Complaint. If a Formal Complaint is not filed, the Reporting Party is still entitled to appropriate supportive measures, as defined and discussed above. A Formal Complaint may be filed by a Reporting Party or signed by the Title IX Coordinator.

In matters involving Title IX-based sexual misconduct, a Formal Complaint must be filed to participate in either the Alternative Resolution or the Formal Process. In matters involving non-Title IX-based sexual misconduct, a Formal Complaint must only be filed if the Reporting Party wishes to utilize the Formal Process.

In situations in which the Reporting Party initially declines to file a Formal Complaint, the Reporting Party may file a Formal Complaint at a later date, though the University's ability to effectively investigate a Formal Complaint may diminish with the passage of time.

After a Formal Complaint is filed, the Reporting Party will be referred to as the "Complainant," and the Responding Party will be referred to as the "Respondent."

Shortly after a Formal Complaint is filed and prior to issuing written notice to the parties (see below), the Response Manager will attempt to contact the Respondent to alert them to the Formal Complaint and will offer to meet with them to discuss supportive measures, outside resources and the response and resolution process. To the extent applicable, this information will be shared in an equitable manner consistent with how it was shared with the Complainant.

E. Notice to Parties

Upon receipt of the Formal Complaint, St. Thomas will provide written notice to the known parties that includes:

- A general description of the allegations of sexual harassment, including the identities of the parties, the conduct allegedly constituting the policy violation, and the date, time and location of the alleged incident, if known;
- A general explanation of the response procedures;
- A statement that the Complainant is presumed to have made the Formal Complaint in good faith;
- A statement that the Respondent is presumed not responsible and that a determination of responsibility will be made at the conclusion of the process;
- Information about a party's right to have an advisor of their choice;
- A statement that parties may inspect and review evidence gathered by the Investigator(s);
- Information about the prohibition of knowingly making false statements or submitting false information during the process;
- Information about the University's non-retaliation policy;
- The Respondent will be provided a copy of this policy and a list of possible sanctions.

If St. Thomas becomes aware of additional allegations during the course of the investigation and chooses to investigate those allegations, St. Thomas will provide additional notice of those allegations to known parties.

F. Determination of Title IX-Based Sexual Misconduct for Purposes of Response and Resolution Process

Prior to or following Notice to the parties, the Response Manager will make an initial determination of whether the reported misconduct meets the requirements for Title IX-based sexual misconduct. In order to be addressed in the process as Title IX-based sexual misconduct, it must meet the definition in the policy, as well as the following additional qualifications:

- The Complainant and the Respondent are both Covered Persons;
- The Complainant was located in the United States at the time of the reported conduct; and
- The alleged conduct occurred on the St. Thomas campus or within a St. Thomas education program activity.

If the Response Manager makes any of the following findings, the Formal Complaint cannot be treated as a complaint of Title IX-based sexual misconduct and instead must be addressed as non-Title IX-based sexual misconduct:

1. Even if true, the allegations would not constitute Title IX-based sexual harassment;
2. The alleged sexual misconduct did not occur in a St. Thomas education program or activity;
3. The alleged sexual misconduct did not occur against a person in the United States.

Whether involving Title IX or non-Title IX-based sexual misconduct, if the Response Manager makes any of the following findings, the Title IX Coordinator has discretion to dismiss the Formal Complaint or to address it in a manner at the Title IX Coordinator's discretion:

1. At any time during the investigation or hearing a Complainant notifies the Title IX Coordinator in writing of a desire to withdraw the Formal Complaint or any allegations contained within the Formal Complaint;

2. The Respondent is no longer enrolled or employed by St. Thomas.

3. Specific circumstances prevent St. Thomas from gathering evidence sufficient to reach a determination regarding the Formal Complaint or allegations contained within it.

In any of the above circumstances where the Formal Complaint is dismissed, the Title IX Coordinator will send prompt written notice simultaneously to both parties of the dismissal and its reason(s). Both parties will have the right to appeal the University's dismissal of the Formal Complaint or any allegations within the complaint. Such appeal will follow the process outlined below (Section VI. G.). In the absence of an appeal, or following an appeal where the dismissal is upheld, the Title IX Coordinator will then address the matter in the Title IX Coordinator's discretion, consistent with any other applicable St. Thomas policies and procedures.

G. Determination of Whether to Follow the Formal Process or Alternative Resolution Process

After a Formal Complaint is filed, the Response Manager will communicate with the Complainant to discuss whether to follow the Formal Process or to pursue an Alternative Resolution Process. If the Complainant has filed the Formal Complaint, St. Thomas will generally defer to the wishes of the Complainant as to whether to pursue the Formal Process or the Alternative Resolution Process. If the Title IX Coordinator has filed the Formal Complaint on behalf of St. Thomas, the Title IX Coordinator and Response Manager, if different from the Title IX Coordinator, will determine whether the nature of the allegations, expectation of party participation, or other circumstances suggest that a particular process is more appropriate. The Response Manager may also gather additional information if needed in order to make this determination. Based on this assessment, St. Thomas may, in its sole discretion, require the initiation of the Formal Process.

SECTION V. ALTERNATIVE RESOLUTION PROCESS

The Alternative Resolution Process is a voluntary, structured process designed to be used when a Complainant does not wish to follow the Formal Process, when a Respondent accepts responsibility and sanctions, when the Title IX Coordinator determines that the nature of the Report or Formal Complaint does not necessitate the initiation of the Formal Process, and/or in other appropriate circumstances as determined by the Title IX Coordinator.

For Title IX-based sexual misconduct, the Alternative Resolution Process may not be initiated unless a Formal Complaint has been filed but remains an option for the parties at any point up until a determination regarding responsibility has been made. For non-Title IX-based sexual misconduct, the Alternative Resolution Process may be initiated without filing a Formal Complaint.

The Alternative Resolution Process may be used to provide remedies for the Reporting Party/Complainant and in some cases, to provide an opportunity for the Responding Party/Respondent to accept responsibility for harm to the Reporting Party/Complainant and/or to the University community, without going through the Formal Process. Resolution options are designed to eliminate the conduct at issue, prevent it from recurring, and address its effects. The

Alternative Resolution Process may not be utilized for Title IX-based sexual misconduct when allegations involve an employee Respondent who has sexually harassed a student Complainant.

A. Notice Provided to Parties

At the initiation of the Alternative Resolution Process, parties will be provided with written notice disclosing the following:

- The allegations of sexual misconduct;
- An explanation of the alternative resolution process, including whether and when it prevents parties from resuming a Formal Complaint arising from the same allegations;
- An explanation that any party has the right to withdraw from the alternative resolution process and resume the Formal Process at any time prior to agreeing to resolution; and
- Any consequences resulting from participating in the process, including records that will be maintained or could be shared.

B. Structure of Alternative Resolution Process

After parties have been provided with Notice, any party who wishes to pursue the Alternative Resolution Process to address sexual misconduct must provide voluntary, written consent to the process.

The structure of the Alternative Resolution Process will depend on the facts and circumstances of the situation. The Response Manager will meet with the Reporting Party/Complainant to review and consider available options to address the alleged misconduct using alternatives to the Formal Process. The Alternative Resolution Process may include one or more of the following:

- acceptance of responsibility by and disciplinary sanctions against the Responding Party/Respondent either before or following the investigation process outlined in the formal process (Section VI.E) below;
- mediation;
- facilitated communication between the Reporting Party/Complainant and Responding Party/Respondent with appropriate involvement by St. Thomas;
- a single or series of educational conversations between Response Manager and Responding Party/Respondent regarding the reported conduct as well as follow up meetings with the Reporting Party/Complainant; and
- a change in the Reporting Party's/Complainant's work, academic, living or other situation within the control of St. Thomas.

At any time before a final resolution is reached, including up to the start of the live hearing in matters eligible for a live hearing under the Formal Process, the Reporting Party/Complainant, the Responding Party/Respondent, and/or the Title IX Coordinator have the right to end the Alternative Resolution Process and initiate or resume the Formal Process. Parties may use a support person in the Alternative Resolution Process to the same extent they could use a support person in the Formal Process. (See Section VI.C below.)

St. Thomas will strive to conclude the Alternative Resolution Process promptly and within ninety (90) calendar days of receiving a Report. The timeframe for particular matters may vary depending on the circumstances, and additional time may be necessary in some situations. All extensions and

postponements of the time limits must be authorized by the Title IX Coordinator or designee and will be no longer than reasonably necessary.

The Alternative Resolution Process will not result in a disciplinary sanction against the Respondent unless the Respondent participates in the process, is given an opportunity to review and respond to the Report or Formal Complaint as applicable and accepts responsibility. This can occur prior to, during, or following the conclusion of the investigation outlined below in the formal process. The disciplinary sanctions under the Alternative Resolution Process may not include expulsion or termination of employment. Remedies available under the Alternative Resolution Process may include, but are not limited to, any one or any combination of the following:

Possible remedies available in all matters include:

- An agreement by St. Thomas to provide additional training to the University community or to a particular audience within the University community;
- An agreement by St. Thomas to provide agreed support measures to the Complainant;
- An agreement by St. Thomas to send a message to the Respondent;
- A mutual no-contact directive.

Possible remedies that include disciplinary sanctions that are available if Respondent participates in the Alternative Resolution Process and accepts responsibility include:

- Behavioral contract;
- Requirement that Respondent attend educational sessions or programs;
- Requirement that Respondent participate in drug and/or alcohol treatment;
- Requirement that Respondent participate in psychological assessment and follow recommendations made;
- Parental notification;
- Requirement that Respondent serve conduct probation (for students);
- Requirement that Respondent move out of University housing;
- Restrictions on campus privileges and access;
- Continuing any interim measures in place;
- Suspension or voluntary withdrawal for one or more semesters (for students); and/or
- Termination warning or other disciplinary warning (for staff) or disciplinary letter (for faculty).

At the conclusion of the Alternative Resolution Process, St. Thomas will provide the Complainant with a letter that includes a written description of the remedies. The Respondent will be provided a similar letter listing any sanctions against the Respondent. The letter to the Respondent will not include information on any support services, accommodations or protective measures offered to the Complainant unless a protective measure, like a no-contact directive, impacts the Respondent. The Complainant and Respondent (if sanctions and acceptance of responsibility are required) will have three (3) working days to agree to the remedies (including any sanctions and acceptance of responsibility) or to request that the Formal Process be instituted or resumed. If neither party objects to the remedies by requesting the Formal Process, the remedies will be entered and considered final.

In cases in which the remedies imposed included disciplinary sanctions against the Respondent, the results of the Alternative Resolution Process are final and will not be changed, except in extenuating circumstances and at the sole discretion of the Title IX Coordinator.

Any resolutions reached in the Alternative Resolution Process must be documented and approved by the Title IX Coordinator (in cases in which the Response Manager is not the Title IX Coordinator) to ensure consistency with the University's Title IX obligations.

SECTION VI. FORMAL PROCESS

The Formal Process generally is used when: (1) a Reporting Party files a Formal Complaint and requests that St. Thomas investigate and adjudicate allegations of sexual misconduct using the Formal Process; (2) St. Thomas determines that use of the Formal Process is necessary based on the totality of the circumstances as described in Section IV.D and the Title IX Coordinator signs a Formal Complaint; or (3) either the Reporting Party or the Responding Party requests or the Title IX Coordinator determines that the Alternative Resolution Process end and the Formal Process be used. As noted above, once a Formal Complaint is filed, the Reporting Party will be referred to as "Complainant," and the Responding Party as "Respondent."

A. Equitable Process for Reporting Party and Responding Party

In the Formal Process, the responsibility lies with St. Thomas to gather evidence sufficient to reach a determination regarding responsibility based on the preponderance of evidence standard. Additionally, the Complainant and Respondent can expect the following:

- equitable procedures that provide both parties with a prompt and impartial investigation and resolution conducted by individuals who receive annual training on conduct prohibited by the policy;
- an equitable opportunity to identify relevant witnesses and other evidence and to suggest possible questions to be asked of witnesses during the investigation, and to present such witnesses and evidence during a live hearing, if any;
- an opportunity to meet with the Investigator(s) and present information on their own behalf, including written and oral statements and physical exhibits;
- an opportunity to receive similar and timely access to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the complaint, including evidence upon which St. Thomas does not intend to rely in reaching a determination regarding responsibility, and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation;
- timely written notice of meetings and hearings, including the date, time, location, participants, and purpose;
- the opportunity to have an advisor of the individual's choice, accompany the individual to meetings and proceedings that are part of the response and resolution process. See Part V.C for additional information;
- the opportunity to determine when and whether to provide or repeat a description of an incident of reported sexual misconduct, and to be informed of the consequences, if any, of not providing or repeating such a description. A decision not to provide or repeat a description of an incident involving reported sexual misconduct may impact the outcome of the investigation or hearing because the recommendation or determination regarding

responsibility made by the Investigator(s) and the determination regarding responsibility by an appointed hearing panel in matters involving a live hearing will be based on a Preponderance of the Evidence.

- The provision of remedies to a Complainant/Reporting Party where a determination of responsibility for sexual harassment has been made against Respondent/Responding Party.

B. Timing

St. Thomas will strive to conclude factfinding and make a determination regarding responsibility as soon as possible and within 90 calendar days of a Formal Complaint being filed. The time frame for particular matters may vary depending on the complexity of the investigation and other factors, and additional time may be necessary in some investigations. In addition, temporary extensions to the timing requirements may be necessary due to factors like the absence of a party, party's Hearing Advisor, or witness, campus offices being closed, the need for language assistance or accommodation of disabilities, or for other reasonable cause. If factfinding is delayed due to law enforcement gathering evidence, St. Thomas will resume its factfinding when law enforcement has finished collecting evidence or earlier, as permitted by law enforcement.

Appeals will be conducted within the timeframe set forth in Section VI.G.

All extensions and postponements of the time limits in these procedures must be authorized by the Title IX Coordinator or designee and will be no longer than reasonably necessary. The Complainant and Respondent will be provided timely notice of any timing extension or postponement that will delay the notice of outcome, including the reason for such extension and postponement.

C. Role of Support Person

Complainants and Respondents may invite a Support Person of their choice to accompany them to meetings or proceedings with St. Thomas officials related to a Report or Formal Complaint of sexual misconduct. The role of the Support Person is to support the Complainant or Respondent in the response and resolution process. A Support Person may consult with and advise the party they are supporting, but the Support Person may not otherwise participate in the University's response and resolution process, unless they are serving as a Hearing Advisor. The Support Person may not speak for or submit information on behalf of the party they are supporting as part of the response and resolution process except as described in the live hearing process. When a party is meeting with the Investigator(s), a party may request reasonable breaks to speak with the party's Support Person.

A Support Person may be any person, such as a St. Thomas faculty or staff member, an attorney, a family member, or any other person. Support persons who are attorneys are subject to the same limitation on participation in the response and resolution process as other Support Persons. If a Support Person is an attorney, St. Thomas has the right to have its own legal counsel present for any meeting at which the attorney Support Person is present. A Support Person for such meetings may or may not be the same person as an individual's Hearing Advisor. However, a party is generally permitted only one accompanying individual—a Support Person in any meeting and a Hearing Advisor in any proceeding. Exceptions will be made at the discretion of the Response Manager.

D. Steps in the Formal Process

If the Complainant, Respondent or St. Thomas decides to pursue the Formal Process, the following steps will be taken.

1. Submission of Signed Complaint

The Complainant must submit a Formal Complaint (as defined in Section I) to the Title IX Coordinator. If the Complainant does not wish to pursue the Formal Process and St. Thomas decides to initiate the Formal Process, then the Title IX Coordinator may sign and submit the Formal Complaint.

2. Assignment of Investigator

The Response Manager will appoint one or more Investigators.

Investigator(s) may be trained St. Thomas employee(s) or trained external Investigator(s), as determined in the sole discretion of the Title IX Coordinator. The Response Manager, if different from the Title IX Coordinator, will consult with the Title IX Coordinator to select the appropriate Investigator(s). Before appointing the Investigator(s), the Response Manager will consider potential conflicts of interest to ensure the appointed Investigator(s) are capable of conducting an impartial fact-finding investigation.

3. Determination of Whether Live Hearing is Required in Sexual Misconduct Matters Not Involving Students

In matters of sexual misconduct that do not involve a student as either the Reporting Party/Complainant or Responding Party/Respondent, the Response Manager will review the Formal Complaint and make a determination as to whether the conduct alleges Title IX-based sexual misconduct or non-Title IX-based sexual misconduct. For non-Title IX-based sexual misconduct, the process will conclude with the determination of responsibility by the Investigator(s). For Title IX-based sexual misconduct, the process will conclude with the live hearing. In all matters, the appeal process outlined below is available to all parties.

4. Notice to Complainant and Respondent

The Response Manager will provide a written notice of investigation to the Complainant and Respondent pursuant to section IV.E above. Investigator(s)If the Complainant or Respondent have concerns that an assigned Investigator has a conflict of interest, they must notify the Response Manager within two (2) working days of their receipt of the notice of investigation.

5. Opportunity to Meet with Response Manager

The Response Manager will offer to meet individually with the Complainant and the Respondent to:

- Review the notice of investigation.
- Inform the party about available supportive measures to support the party. Ensure the party understands how to access appropriate support resources.
- Review the policy and these procedures, specifically noting:
    - the expectation of an equitable process, as described in section VI.A of these procedures;
    - the timing and deadlines for action under the policy;
    - the confidentiality provisions, including, in student matters, the University's general practice of not notifying parents and encouraging students to inform their parents; and
    - the prohibition on retaliation.

- Address the party's questions about the policy and the Formal Process and discuss whether the party has concerns about any potential conflicts of interest that could affect the process.
- Discuss any anticipated follow-up by St. Thomas that the parties can expect.

6. Investigation

a. Factfinding Process

The Investigator(s) will conduct an impartial inquiry into the facts and circumstances related to the Complaint. At a minimum, the Investigator(s) will seek to interview the Complainant and Respondent. While the structure of the factfinding process may vary depending on the circumstances of each matter, the process will generally include: one or more interviews of each party by the Investigator(s), interviews by the Investigator(s) of witnesses, review by the

Investigator(s) of other available evidence, and an opportunity for each party to review and respond to summaries of witness interviews and inculpatory or exculpatory evidence whether obtained from a party or other source so that each party can meaningfully respond to the evidence prior to conclusion of the investigation.

b. Principles for the Collection and Consideration of Evidence

The Investigator(s) have authority and discretion to determine the scope of the investigation and to request potentially relevant information, documentation, other materials and interviews from individuals as the deem appropriate. The Investigator(s) have authority, at their discretion, to weigh evidence collected during the investigation, including the credibility of the parties and witnesses and the appropriateness, relevance and significance of information collected during the factfinding investigation. In matters that result in a live hearing, the Investigator(s) will make a recommendation regarding responsibility based on their investigation and utilizing the

Preponderance of the Evidence standard. The hearing panel may consider the recommendation of the Investigator(s), but ultimately must make its own independent determination regarding responsibility based on the facts and evidence available and presented in the hearing as described below. In matters that do not result in a live hearing, the Investigator(s) will make determinations on the basis of the Preponderance of the Evidence standard. The following principles generally apply to the investigation process:

- Recommendations and Determinations Made Based on Evidence. The investigation is a neutral, fact-gathering process. Investigator(s) begin an investigation with a presumption that the Complaint is made in good faith and that the Respondent is not responsible for a policy violation until a determination regarding responsibility is made at the conclusion of the process. Recommendations and determinations regarding responsibility are based on the Investigators' assessment of the facts and an objective evaluation of relevant evidence collected. The Investigator(s) will only determine or recommend a finding that a Respondent is responsible for a policy violation if the Investigator(s) determines that there is sufficient evidence, by a Preponderance of the Evidence standard, to support such a recommendation or determination.
- Voluntary Participation by Complainant and Respondent. Complainants and Respondents may choose to participate or decline to participate in the investigation. The participation of both parties is not required for an investigation to proceed or a hearing to occur. When considering whether to participate in the investigation or hearing, it is important for parties to be aware that if a party declines to participate in the investigation, the other party's version of events may be left unrefuted, and the Investigator(s) may not have all the relevant

evidence when making the recommendation regarding responsibility, and the hearing panel may not have all the relevant evidence when making a determination regarding responsibility.

- Expectation of Truthfulness. The Complainant, the Respondent, and all witnesses are expected to provide truthful information to the Investigator(s).
- Expectation of Timely and Prompt Cooperation. In order to ensure completion of the investigation in a timely manner, parties are expected to make themselves available to meet with Investigator(s) at the requested times. Investigator(s) schedule meetings at times that do not conflict with the class schedule of student and faculty parties and make reasonable efforts to accommodate other scheduling needs of a party. In order to assure a timely process, the Investigator(s) may deny a party's request to re-schedule meetings. If a party wishes to have an advisor accompany them to meetings with the Investigator(s), the advisor is expected to arrange to be available to meet at the time designated by the Investigator(s).
- Ability to Identify Witnesses and Provide Evidence. Both parties will be provided an opportunity to identify potential fact and expert witnesses and to provide documents, communications (such as email or text messages), photographs, video and other evidence to the Investigator(s). Additionally, parties have the opportunity to identify or provide inculpatory or exculpatory evidence whether from a party or other source.
- Investigator(s) Determine Relevance of Evidence During Investigation. The Investigator(s) have discretion to determine the relevance and significance of any evidence collected. The Investigator(s) must gather evidence directly related to the allegations, whether or not such evidence will be relied on. In general, Investigator(s) will not give weight to statements as to any party's general reputation for any character trait unless relevant and it substantiates sexual misconduct may have occurred. The Investigator(s) will generally only interview witnesses whom the Investigator(s) determine are likely to have factual information related to the investigation. Witnesses generally cannot participate in the investigation process solely to speak about a party's or another witness's character unless it is directly related to the allegations and substantiates sexual misconduct may have occurred.
- Investigator(s) Make Credibility Determinations Regarding Witnesses During Investigation. The Investigator(s) will make determinations regarding the credibility, or perceived truthfulness, of all parties, including witnesses. Such determinations will not be based on a person's status as a Complainant/Reporting Party, Respondent/Responding Party, or witness.
- Investigator(s) Have Discretion to Seek Additional Evidence. The Investigator(s), in their discretion, may:
    - visit relevant locations and record observations through written, photographic or other means;
    - interview witnesses not identified by the parties; and
    - consult medical, forensic, technological or other experts when they determine that expertise will help the Investigator(s) to achieve a fuller understanding of issues or evidence relevant to the particular investigation.
- Opportunity to Respond to Evidence. The Investigator(s) will provide the Complainant and Respondent timely and equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised, including evidence upon with the Investigator does or Investigators do not intend to rely in reaching a recommendation regarding responsibility and inculpatory or exculpatory evidence whether

obtained from a party or other source, and an opportunity for each party to meaningfully respond to the evidence prior to conclusion of the investigation through written or oral statements.

- Medical Records. A party's medical and counseling records are confidential and are not accessible to the Investigator(s) without the written consent of the party who is the subject of the record. Parties are not required or expected to share medical records. Parties may choose voluntarily to share all or a portion of such information in the party's sole discretion. Sharing private medical information may have consequences. Parties are encouraged to speak with someone they trust, including their medical provider(s), their attorney if they have one, or their advisor before making a decision of whether to share medical records. Complainants who have filed a criminal complaint also may want to speak with the investigating agency. If a party voluntarily chooses to share information from medical or counseling records with the Investigator(s), relevant portions of the medical records and/or a summary of those records, like other evidence, will be made available for the other party to review consistent with the "Opportunity to Respond to Evidence" paragraph above. Nonrelevant information will be redacted as permitted or required by federal and state law.
- Prior Consensual Sexual History. Evidence related to the sexual behavior, sexual preferences or prior consensual sexual history of either of the parties generally is not relevant to the determination regarding responsibility for a policy violation and will be considered only in limited circumstances. For example, evidence of consent to sexual contact on one occasion will not, by itself, be used to demonstrate consent on a subsequent occasion. However, if the question being determined is whether consent was given, information about the manner and nature of communication between the two parties related to sexual contact in prior sexual encounters involving the two parties may be deemed relevant to the determination of whether consent was given during the incident in question. Additionally, prior sexual history may be relevant if it is offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant.
- Determinations of Policy Violations Involving Consent. Independent corroboration of a Complainant's testimony is not required to show lack of consent. This means, for example, that there does not need to be an eyewitness to the sexual interaction (other than the Complainant or Respondent) for the Investigator(s) to recommend or the hearing board to find responsibility for a policy violation. All recommendations and determinations of policy violations are made based on a Preponderance of the Evidence ("more likely than not") standard based on all the evidence, including information provided by the Complainant and the Respondent.
- Determinations of Policy Violations Involving Incapacitation. Incapacitation will be determined based on all the facts and circumstances, looking at whether the individual was able to understand the facts, nature or extent of the sexual conduct and whether such condition was known or reasonably should have been known to the Respondent. In matters where there is a question about whether the Complainant was incapacitated, St. Thomas will ask: (1) Was the Complainant incapacitated, and (2) Did the Respondent know, or should the Respondent reasonably have known, that the Complainant was incapacitated? Only if the answer to both questions is "yes", and it is determined that sexual activity took place, will the Respondent be determined responsible for a violation of the policy, regardless of whether the Complainant expressed consent.
- Special Considerations Applicable to Investigations Involving Certain Schools and Colleges. Given the possible application of professional duties of confidentiality, confidential email, files and other data of designated members of the School of Law, the College of Education, Leadership and Counseling, and the School of Social Work will not be examined for content

nor disclosed without the prior approval of the dean of the school or, in matters of a conflict of interest, the provost or provost's designee.

- Application of AAUP Principles and Comments Relating to Academic Freedom. If the Respondent is a faculty member alleged to have engaged in sexual harassment of the Complainant, and if there is a perceived or potential conflict between (1) the limitations on conduct and communications implied by the definition of sexual harassment under the policy and (2) the principles of academic freedom, the Investigator(s) will work with the dean, provost or the provost's designee (as applicable) to ensure the appropriate application of the AAUP Principles and Comments.

c. Status Updates

The Investigator(s) will provide status updates to the Complainant and Respondent at least monthly during the investigation and as necessary to alert them of any material changes in time estimates for completing the investigation.

d. Notice of Close of Investigation

As the investigation nears its end, the Investigator(s) will provide written notice to the Complainant and Respondent of the pending close of the investigation and a final deadline by which additional evidence or information must be submitted for consideration by the Investigator(s).

e. Review of Preliminary Factfinding Report in Certain Matters

The Investigator(s) will prepare a preliminary factfinding report upon completion of all interviews with the parties and witnesses and review of other evidence submitted. The preliminary factfinding report will contain a summary of the interview(s) with each party and witness and will identify all evidence initially determined by the Investigator(s) to be relevant to the investigation.

Following preparation of the preliminary factfinding report, the Response Manager will notify the Complainant and the Respondent of an opportunity to review the report and to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised, including the evidence upon which the Investigator does or Investigators do not intend to rely in making a recommendation regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source. The Response Manager will send to the parties and their advisor, if any, the preliminary report and evidence subject to inspection and review in an electronic format or hard copy. The parties will have ten (10) calendar days to submit a written response. The parties may take notes regarding the report. Parties may not make copies, take photographs or make other recordings or images of the report or evidence. Parties and their advisors may be required to sign a non-disclosure agreement identifying that the review and use of evidence is permitted solely for the purposes of the sexual misconduct process.

The purpose of this response is (1) to identify any evidence the party believes to be relevant that the Investigator(s) did not include in the preliminary report or initially identify as relevant, and (2) to meaningfully respond to the preliminary report and evidence. The purpose is not to present additional evidence, unless there is new evidence documented in the report that was not known to the party. Each party's response should not exceed 2,000 words in length, unless one party requests and the Response Manager grants an opportunity for both parties to submit a longer response. The response must be submitted within ten (10) calendar days after the first day the report has been made available for review. Any response submitted by a party will be made available for the other party in an electronic format or hard copy.

The Response Manager and the Investigator(s) will review the responses submitted by the parties, if any. Based on this review, the Investigator(s), in consultation with the Response Manager, will decide whether to: (1) proceed to make a recommendation regarding responsibility, or (2) conduct additional factfinding. If additional factfinding will be conducted, the Response Manager will provide written notice to the Complainant and the Respondent of the determination to conduct additional factfinding, the anticipated timeline for such factfinding, and any opportunity for both parties to review and respond to additional evidence collected.

f. Recommendation Regarding Responsibility

Upon completion of the investigation and following review of the preliminary report by the parties and any responses and additional factfinding (if any) consistent with Section VI.D.6 above, the Investigator(s) will weigh the evidence and in a matter of Title IX-based sexual misconduct, or a matter of non-Title IX-based sexual misconduct that involves a student as Complainant or Respondent, make a recommendation, using a Preponderance of the Evidence standard (e.g. "more likely than not"), whether the Respondent is responsible or not responsible for violating the policy. For matters of non-Title IX-based sexual misconduct that do not involve a student as either the Complainant or Respondent, the Investigator(s) will make a determination using the Preponderance of the Evidence standard whether the Respondent is responsible or not responsible for violating the policy.

g. Final Factfinding Report

The Investigator(s) will prepare a final factfinding report that fairly summarizes relevant evidence and includes the Investigator(s)' recommendation or determination regarding responsibility and identifies the reasons for the recommendation or determination.

The Investigator(s) will submit the preliminary factfinding report, any response(s) by the parties, and the final factfinding report to the Response Manager and (if different) the Title IX Coordinator. The Title IX Coordinator will review the final factfinding report and other relevant materials to ensure that the report and recommendation or determination are consistent with St. Thomas policies, procedures and practices. If the Title IX Coordinator determines that the report and recommendation or determination are not consistent with St. Thomas policies, procedures and practices, the Title IX Coordinator has discretion to direct or take appropriate action.

At least ten (10) calendar days prior to a hearing, if required, the final factfinding report will be sent to each party and the party's advisor, if any, in electronic format or hard copy, for their review and written response. The purpose of the written response is to (1) identify any disagreements by the party with the determinations of the Investigator(s) regarding the relevance of particular evidence, or (2) to comment on the final factfinding report.

h. Live Hearing Principles and Process

For all Formal Processes except those involving non-Title IX-based sexual misconduct where a student is neither the Complainant nor Respondent, the conclusion of the investigative process will lead to the live hearing. The purpose of the live hearing is for the hearing panel to have the opportunity to hear directly from the parties and witnesses prior to making a determination of responsibility All participants—parties, Hearing Advisors, and witnesses—are required in advance of the hearing to agree in writing to abide by any additional rules governing conduct at the hearing that are created and disseminated by St. Thomas. Any questions regarding those rules should be directed to the Title IX Coordinator.

1. Timing

Parties will be informed of the date and time of the live hearing no fewer than ten (10) calendar days prior. The Response Manager will strive to be respectful of party and advisor schedules in determining a suitable time for the hearing. In matters involving student parties, the hearing will be scheduled so as not to conflict with student class schedules. To ensure prompt and equitable conclusion of the process, parties are expected to make themselves available to the greatest extent possible so a hearing can be scheduled promptly following completion of the final factfinding report. Parties will have two (2) calendar days to inform the Response Manager in writing of any conflict that prevents them from attending the scheduled hearing. In the absence of such notice or other unique circumstances, the hearing will move forward on the scheduled date, regardless of whether both parties or Hearing Advisors are present. If a party is present but the Hearing Advisor is absent without timely notice as described above, the University reserves the right to move forward with the hearing utilizing a University-provided Hearing Advisor or to reschedule for a future date.

2. Hearing Panel

The Hearing Panel will be composed of two St. Thomas employees, who may be either faculty or staff, and a chair. The chair may be a trained St. Thomas employee or a trained external individual. All members of the Hearing Panel will receive annual and ongoing training in compliance with federal regulations.

At least five (5) calendar days prior to the hearing, the Response Manager will inform the parties of the individuals serving on the hearing panel. If the Complainant or Respondent has concerns that an assigned hearing panel member has a conflict of interest, they must notify the Response Manager within three (3) calendar days of their receipt of the notice.

The chair will be responsible for conducting the hearing, including making determinations of relevance for cross-examination questions, and explanations to exclude questions deemed by the chair to not be relevant.

3. University-Provided Hearing Advisor

A party may never conduct cross examination on their own behalf. If a party does not have a Hearing Advisor present, St. Thomas will provide one without charge or fee to conduct cross-examination on the party's behalf.

In the event that neither a party nor their Hearing Advisor is present at the hearing, St. Thomas will provide a University-appointed Hearing Advisor to appear on behalf of the non-appearing party to conduct appropriate and relevant cross-examination of the other party and witnesses.

Parties are strongly encouraged to contact the Response Manager in advance of the hearing to request a Hearing Advisor if one is needed, or to inform the Response Manager if neither they nor their Hearing Advisor plan on attending the hearing. The absence of such notice may make it difficult for St. Thomas to provide a Hearing Advisor for the scheduled hearing, requiring the hearing to be cancelled and rescheduled, thus delaying the process.

4. Role of Hearing Advisor

Whether provided by St. Thomas or chosen by the party, the primary role of the Hearing Advisor is to conduct cross-examination on behalf of the party. Hearing Advisors may ask the other party and witness relevant questions and follow up questions, including questions challenging credibility.

5. Right of Non-Participation

Neither parties nor witnesses are required to participate in the live hearing process. When considering whether to participate in the hearing, it is important for parties to be aware that if a party declines to participate in the hearing, the hearing panel may not have all the relevant evidence when making a determination regarding responsibility. A party who chooses not to attend a hearing may still send that party's Hearing Advisor to the hearing to appear and conduct cross-examination.

6. Hearing Process

All hearings will generally occur with parties located in separate rooms with technology enabling the hearing panel and parties to simultaneously see and hear the party or witness answering questions. Parties are required to keep their cameras on for the entirety of the hearing, excluding scheduled breaks. Witnesses are required to keep their cameras on for the entirety of their participation in the hearing. Hearings will be conducted as outlined in a written procedural document to be provided by the Response Manager to both parties ahead of the hearing. The procedures will align with the requirements of this policy.

i. Hearing Panel Questions. The chair, at their discretion, will ask parties and witnesses questions determined by the hearing panel to be relevant. Parties and witnesses may refuse to answer such questions, and the hearing panel cannot draw any inference of responsibility based solely on a party's refusal to answer such questions.

ii. Cross-Examination. At the conclusion of the panel's questions, the parties will each have an opportunity, via their advisor, to ask the other party and any witnesses relevant questions and follow up questions, including questions challenging the credibility of a party or witness. While parties and their Hearing Advisors are not required to submit cross-examination questions in advance, St. Thomas encourages parties and Hearing Advisors to do so when possible in order to facilitate advance determinations of relevancy to facilitate the smooth functioning of the hearing process and decrease delays due to the need to otherwise make simultaneous determinations of relevancy.

iii. Determinations of Relevance. Before a party or witness answers a cross examination or other question, the chair will make a determination of whether the question is relevant and explain any decision to exclude a question as not relevant.

A determination of relevance generally involves whether a question asks about information that is "probative of any material fact concerning the allegations." More simply, the hearing chair must determine whether a question seeks evidence or information that is likely to prove whether important facts regarding the allegations are more or less likely to be true.

Questions and evidence about a Complainant's sexual predisposition or prior sexual behavior are not relevant unless such questions or evidence is offered to (1) prove that someone other than Respondent committed the alleged conduct, or (2) if the questions and evidence concern specific instances of Complainant's prior sexual behavior with Respondent and are offered to prove consent.

iv. Evidence and Information Generally Considered Irrelevant or Not Appropriate for Use in the Live Hearing. In addition to the information above that is relevant in only narrow circumstances, the following information is also not subject to use in the formal process and live hearing:

- Information protected by a legally recognized privilege;
- Information related to a party's character unless deemed relevant by the panel and the information substantiates misconduct may have occurred;

- Evidence about a Complainant's sexual behavior, sexual preferences or prior sexual history (subject to exceptions above);
- Any party's medical, psychological, and similar records unless a party has given voluntary, written consent and nonrelevant information is redacted as permitted or required by federal or state law;
- Questions that are duplicative or repetitive.

v. Options When a Party Disagrees with a Relevance Determination. If a party or witness disagrees with a relevance determination, they may either (1) abide by the determination and answer the question, or (2) refuse to answer the question.

vi. No Inference Drawn from Lack of Participation or Refusal to Answer Questions. The hearing panel may not draw any inference about the determination regarding responsibility based solely on a party or witness' absence at the hearing or refusal to answer cross-examination or other questions.

vii. Consideration of Non-Statement Evidence. Regardless of whether a party or witness submits to cross-examination, the hearing panel must always evaluate relevant non-statement evidence.

viii. Determination When No Party Appears for Hearing. If neither party appears for the live hearing, or both parties indicate that they do not intend to participate, the hearing panel can and should still make a determination regarding responsibility where evidence has been gathered and presented to the panel.

ix. Determination Regarding Responsibility. Following the conclusion of the hearing, the hearing panel will deliberate and make a determination regarding responsibility on the basis of the preponderance of the evidence. Such determination will be made upon consideration of the relevant evidence.

The hearing panel will issue a written determination regarding responsibility for the Response Manager to provide the parties consistent with Section VI.F below. The written determination will be provided to the parties simultaneously and will include the following:

- Identification of allegations;
- Description of procedural steps taken from receipt of Formal Complaint through determination, including communications with parties, site visits, methods used to gather evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions based on the application of the policy to the facts;
- A statement of, and rationale for, the determination as to each allegation, including a determination regarding responsibility and relevant sanctions and remedies; and
- A description of the procedures and bases for appeal.

x. Recording of Hearing. The hearing will be recorded, by either video or audio, at the determination of the Title IX Coordinator, and will be made available to the parties for inspection and review upon request.

i. Sanctions Determination

1. Title IX-Based Sexual Misconduct and Certain Non-Title IX-Based Sexual Misconduct Sanction Determination

In matters involving Title IX-based sexual misconduct or involving non-Title IX-based sexual misconduct where a student is either the Complainant or Respondent, the hearing panel will determine appropriate sanctions. The hearing panel will consult with relevant St. Thomas officials, generally those identified in the chart below or their designee, as part of the sanction determination process.

2. Non-Title IX-Based Sexual Misconduct Sanction Determination Not Involving Students

In matters of non-Title IX-based sexual misconduct where a student is neither the Complainant nor Respondent, the Response Manager will work with the appropriate St. Thomas administrators, as set forth below, to determine what, if any, sanctions will be imposed or other action will be taken by St. Thomas.

If the Respondent is a(n) . . .	Sanctions will be determined by or in consultation with the . . .
Undergraduate student	Dean of Students, in consultation with the Response Manager and, if different, the Title IX Coordinator, and if appropriate under the circumstances, such as matters involving students in licensure programs, the dean of the applicable college or school
Graduate or professional student	Dean of Students and dean of the applicable college or school, in consultation with the Response Manager and, if different, the Title IX Coordinator
Faculty or staff member	The member of the President's Cabinet with the most direct responsibility for the Respondent's school, college or unit and the Chief Human Resources Officer or designee, in consultation with the Response Manager and, if different, the Title IX Coordinator
Both a student and an employee	Dean of Students and Chief Human Resources Officer or designee, in consultation with the Title IX Coordinator
Not a student or employee	Title IX Coordinator, in consultation with Public Safety and any other appropriate administrators

E. Possible Sanctions

Not all policy violations are deemed equally serious offenses, and St. Thomas may impose different sanctions depending on the particular violation, facts and circumstances, including but not limited to the severity of the offense, any previous conduct violations or disciplinary action, and whether the Respondent poses a threat to the health or safety of member(s) of the St. Thomas community. The imposition of sanctions is designed to address sexual misconduct, prevent its recurrence and remedy its effects, while supporting and advancing the University's mission and convictions. Examples of sanctions that may be used include but are not limited to any one or any combination of the following:

Student Respondent

- Written warning;
- No contact directive;

- Disciplinary probation;
- Requirement to attend educational sessions or programs;
- Requirement to participate in drug and/or alcohol treatment;
- Requirement to participate in psychological assessment;
- Behavioral contract;
- Removal from University housing;
- Removal from specific course(s) or activities;
- Restriction on campus privileges and access;
- Continuing any interim measures in place;
- Suspension; and/or
- Expulsion.

Faculty/Staff Respondent

- Written warning;
- No contact order;
- Requirement to attend educational sessions or programs;
- Requirement to participate in drug and/or alcohol treatment;
- Behavioral contract;
- Disciplinary letter;
- Unpaid suspension;
- Loss of faculty or staff privilege(s);
- Demotion (staff);
- Notice of contract non-renewal (contracted staff and faculty without tenured appointment);
- Termination (staff; faculty without an annual contract); and/or
- Recommendation to President to institute dismissal for cause proceedings (faculty with an annual contract or tenured appointment).

For staff who are Respondents, the application of sanctions will be in accordance with all applicable policies and, if the employee is a member of a collective bargaining unit, the applicable labor agreement. For faculty who are Respondents, the application of sanctions will be consistent with the applicable disciplinary policies contained in the Faculty Handbook and, to the extent applicable and not superseded by the Faculty Handbook, all other applicable policies.

The identified administrators, in consultation with the Response Manager and, if different, the Title IX Coordinator, are authorized to apply any sanction or other response that they together determine to be fair and proportionate to the misconduct.

F. Notice of Outcome to Complainant and Respondent

The Response Manager will simultaneously provide a written notice of outcome, by letter or email, to the Complainant and to the Respondent. The parties will be informed no later than 24 hours before a decision is rendered regarding the timeline of the outcome's release. The written notice will

offer community mental health resources and, if applicable, on-campus resources equitably for both parties. Additionally, the notice of outcome will not be delivered at the end of the day or during a weekend or holiday to ensure parties have the opportunity to arrange supportive services.

The notice also will include information about the appeal process and when the outcome will be final. In matters that involved a hearing, the notice of outcome will include a copy of the hearing panel's determination of responsibility. In matters resolved without a hearing that involved sexual assault, domestic violence, dating violence, or stalking and in matters involving reports of sexual harassment in which a faculty member is a party and has asserted a defense of academic freedom, the notice of outcome will include information about the opportunity to review the final factfinding report. Any such review of the final factfinding report will be conducted a manner consistent with any applicable St. Thomas practices regarding confidentiality and privacy, including the Family Educational Rights and Privacy Act, if applicable and consistent with practices outlined above regarding review of the preliminary report. The written notifications must be sent within ten (10) working days of the Response Manager's receipt of the final factfinding report and will be sent to the Complainant and the Respondent at the same time.

St. Thomas may be limited in the information it may share with the Complainant as part of or otherwise in connection with this notice of outcome. At a minimum, the outcome letter sent to the Complainant will contain the following information: the determination regarding responsibility, information about the rationale, and, if the Respondent was determined responsible for a policy violation, any sanctions imposed that directly relate to the Complainant. In sexual misconduct incidents involving allegations of Title IX-based or non-Title IX-based sexual assault, domestic violence, dating violence or stalking, the notice of outcome also will contain additional information about sanctions against a Respondent who was determined responsible for a policy violation.

The Response Manager also will ensure that appropriate St. Thomas administrators, faculty and/or staff members who have a need-to-know information about the outcome have been or are provided with such information. This may include the member(s) of the President's Cabinet responsible for a Respondent's school, college or unit, and in the circumstance of Respondents who are employees, the Respondent's supervisor.

If there is any change to the outcome following delivery of the original notice of outcome, including a change as a result of a typing error, the Complainant and Respondent will be provided notice of the change at the same time.

G. Appeal Process

1. Grounds for Appeal

Both the Complainant and the Respondent are entitled to appeal a dismissal and/or the results of the Formal Process if on one or more of the following bases:

a. a procedural irregularity occurred that affected the outcome of the process, including but not limited to that the decision was not supported by a preponderance of the evidence or was arbitrary and capricious;

b. the decision violated academic freedom;

c. there has been discovery of new evidence by the appealing party that was not reasonably available at the time of the determination regarding responsibility that could affect the outcome of the matter;

d. The Title IX Coordinator, Investigator(s), or hearing panel had a general or specific conflict of interest or bias against the Complainant or Respondent that affected the outcome.

An appeal represents a procedural safeguard for the parties. Appeals may not be brought merely because one of the parties disagrees with the outcome. Similarly, an appeal is not an opportunity to present evidence previously known or reasonably available to the appealing party that the appealing party omitted to provide to the Investigator(s) during the investigation or the hearing panel during the live hearing, if any.

2. Submitting an Appeal

A written request for an appeal must be submitted to the Title IX Coordinator within five (5) working days following the date that notification of the dismissal or outcome of the investigation was sent to the appealing party. The written request for appeal must include a notice of appeal and a signed, written statement, not to exceed 2,000 words, clearly identifying the applicable grounds for appeal, as described in Section VI.G.1 above, and the reason(s) for the appeal with respect to each ground identified. The notice of appeal and the written statement may be submitted together or separately.

3. Supportive Measures

Consistent with the provisions of Section IV.C.1-2, following the submission of a notice of appeal, the Response Manager, in consultation with appropriate administrators, will determine appropriate supportive measures designed to protect the safety of all parties or the University's educational environment or to deter sexual harassment. protect the community and the parties while the appeal is pending. The Response Manager shall notify the Complainant and the Respondent of such supportive measures. Examples of supportive measures are listed in Section IV.C.1.

4. Opportunity to Review the Request for Appeal

Within two (2) working days of receiving a notice of appeal from a party, the Title IX Coordinator will inform the other party that a notice of appeal has been submitted. For matters that went to a hearing, the other party will have up to two (2) working days following the deadline for submission of an appeal to review the request for appeal, which the Response Manager will send to the party in electronic format. For matters that did not go to a hearing, the other party will have the same amount of time and ability to review the request for appeal, though review will be subject to the University's obligations under FERPA. In either instance, the other party may, if they choose, submit written comments, not to exceed 500 words, within three (3) working days following such review.

5. Appointment of Appeal Officer

Promptly following receipt of the request for appeal, the Title IX Coordinator will appoint an Appeal Officer. The Appeal Officer generally is determined based on the identity of the Responding Party, as set forth in the table below. The Appeal Officer has the duties described in the subsequent paragraphs.

If the Respondent is a . . .	The Appeal Officer is. . .
Student (who is not also a regular faculty or staff member)	The Vice President for Student Affairs
Faculty or staff member (who is not a student worker)	Executive Vice President and Provost

The Title IX Coordinator will consider whether the proposed Appeal Officer has a conflict of interest. In matters involving a potential conflict of interest or other issue preventing an individual from serving as an Appeal Officer, the Title IX Coordinator may appoint an alternate Appeal Officer

who has received appropriate training. The Appeal Officer may not be an Investigator, hearing panel member or the Title IX Coordinator.

6. Appointment of Appeal Board

In matters in which the Respondent is a staff or faculty member, the Appeal Officer will appoint an appeal board comprising five St. Thomas employees who do not have a conflict of interest and who have not served as Investigators, hearing panel members or the Title IX Coordinator. If the Respondent is a faculty member, the members of the appeal board will be full-time tenured faculty members selected in accordance with the Faculty Handbook process for appointing grievance hearing committees.

In matters in which the Respondent is a student and in matters in which the Respondent is another individual who is not a student or employee, the Appeal Officer may consider the appeal directly or the Appeal Officer may, using personal discretion, appoint an appeal board of three to five employees who are faculty or staff members (not student workers).

All appeal board members must receive or have in the past year received training on the policy, procedures and applicable law. The appeal board will appoint a chair from among its members.

7. Consideration of Appeal

The appeal board (or Appeal Officer, if no appeal board has been appointed):

- Will review the appeal, any response submitted by the other party, the notices of outcome or dismissal, hearing panel determination (if any) and the final factfinding report (if any) and consider any previously undiscovered evidence (if discovery of new evidence is a ground for appeal).
- May choose to meet with the parties, the Investigator(s), hearing panel members, or others and consider other additional information, in its (or the Appeal Officer's) sole discretion.
- Will consider whether it is more likely than not that the designated grounds for appeal have been satisfied.

If an appeal board is used, deliberations of the appeal board will be confidential. The appeal board will attempt to reach consensus. If consensus is not possible, the appeal board will vote, with each member having one vote. Determinations will be made based on a majority of the total number of votes eligible to be cast.

If an appeal board is used, the appeal board will provide the Appeal Officer with a written report of its findings of whether the designated grounds for appeal have been satisfied and, if so, a recommendation as to whether St. Thomas should remand the matter or take any different or additional action than was originally determined. Such report will be provided to the Appeal Officer no later than twenty (20) working days following the submission deadline for a written request for appeal, unless the Title IX Coordinator extends such timing based on specific facts and circumstances.

The Appeal Officer will give careful consideration to the recommendation of the appeal board but will not be bound by it. As soon as possible, but no later than five (5) working days following receipt of the appeal board's findings and recommendations, the designated Appeal Officer will notify the Complainant and Respondent in writing of the appeal board's findings and recommendation and the final disposition of the appeal. In matters involving sexual assault, dating violence, domestic violence or stalking, the notice will include a description of any change(s) to the outcome, a

rationale for the determination, whether the result is final and, if applicable, when the determination will become final.

If no appeal board is used, the Appeal Officer will issue a written decision stating the Appeal Officer's findings and the final disposition of the appeal within fifteen (15) working days following the submission deadline for a written request for appeal.

In all cases, written appeal decisions will be issued to the parties simultaneously and under the same limitations and protections as notices of outcome under Section VI.F (e.g. offer relevant support resources, not be issued during weekends, etc.).

The Appeal Officer will notify appropriate St. Thomas administrators, faculty and staff members of the outcome on a need-to-know basis.

The Appeal Officer, in consultation with the Title IX Coordinator, may shorten or extend the timeframes above depending on the overall timing of the response and resolution process and other factors, including, without limitation, University holidays and breaks, availability of appeal board members, and specific circumstances related to the appeal. If an extension is necessary, the consideration and determination of the appeal must be conducted as promptly as possible. The parties will be notified in writing if the notice of outcome of appeal will be materially delayed due to any changes to the timeframes noted above.

8. <u>No Further Appeal</u>

Appeals arising out of alleged violations of the policy must be made under this appeal process and are not eligible for consideration under faculty, staff or student grievance policies or processes. The President has discretion to modify a decision in exceptional circumstances.

SECTION VII. RECORDKEEPING

The Title IX Coordinator is responsible for maintaining the official St. Thomas records of sexual misconduct Reports and Formal Complaints. When a Report or Formal Complaint is pending, each official having a role in the response and resolution process is responsible for handling records appropriate to the official's role. When the process is complete, the official records relating to the Formal Complaint or Report will be provided to the Title IX Coordinator, who will maintain such records in accordance with St. Thomas record retention requirements and applicable law for a period of at least seven (7) years. The official records include:

1. A copy of any Public Safety Report submitted related to the matter (Public Safety will maintain the original or a copy);
2. A record documenting the reason for following the Formal Process or Alternative Resolution Process.
3. Record indicating whether and when the Response Manager met with the Reporting Party and/or Responding Party and the issues covered;
4. A description of any supportive measures provided and copies of correspondence from St. Thomas to the Reporting Party and Responding Party relating to the supportive measures, including:
    a. Documentation of the basis for concluding the response was not deliberately indifferent;
    b. Documentation showing that the measures are designed to restore or preserve equal access to the University's education program or activity.

5. If no supportive measures are provided, documentation of reasons as to why such a response is not clearly unreasonable in light of the known circumstances.
6. Copies of any notices or summaries given to the Reporting Party and/or Responding Party;
7. In matters where the Alternative Resolution Process is used:
    a. a copy of the Formal Complaint;
    b. the preliminary factfinding report (if applicable) and the final factfinding report;
    c. a copy of the parties' signed, written consent for resolution via the Alternative Resolution Process;
    d. evidence submitted by the parties, if any; and
    e. a summary of the process used and responsive action taken by St. Thomas; and
    f. copies of the notices of outcome provided to the parties related to the factfinding;
8. In matters where the Formal Process is used:
    a. a copy of the Formal Complaint;
    b. the preliminary factfinding report (if applicable) and the final factfinding report;
    c. copies of any statements provided by the parties or witnesses, including responses to the preliminary factfinding report (if applicable);
    d. evidence submitted by the parties;
    e. A recording or transcript of the hearing;
    f. The hearing panel determination regarding responsibility;
    g. appeal request, if any;
    h. documentation demonstrating appointment of appeal board, if applicable;
    i. report of appeal board, if applicable;
    j. decision of Appeal Officer; and
    k. copies of the notices of outcome provided to the parties related to the factfinding and, if any, the appeal; and
9. A timeline of communication with the parties.
10. Records of any disciplinary sanctions imposed on the Respondent, and any remedies provided to the Complainant designed to restore or preserve equal access to education programs or activities at St. Thomas.
11. All materials starting August 14, 2020, used to train Title IX Coordinators, Investigators, decisionmakers, and any person who facilitates an Alternative Resolution Process.

Each official having a role in the response and resolution process may elect to send additional records to the Title IX Coordinator depending on the particular facts and circumstances. Personal notes of officials involved in the response and resolution process generally will be maintained in the sole possession of the official who took the notes according to the official's normal recordkeeping practices, any applicable St. Thomas record retention requirements and applicable law.

Records related to Reports and Complaints will be treated as confidential and shared only on a need-to-know basis or as required by law.

Reporting Suspected Child Abuse Policy

Policy number: 107
Policy owner: Office of General Counsel

Date of initial publication: June 2014
Date of latest revision: May 25, 2023

SECTION I. PURPOSE

The University of St. Thomas has zero tolerance for child abuse or exploitation of any kind. One of the most effective ways to protect children is to report known or suspected abuse and exploitation to appropriate authorities. The purpose of this policy is to ensure prompt reporting of known or suspected child abuse and child pornography, so that appropriate authorities can take timely action to stop the abuse or exploitation and address its effects.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to St. Thomas students, employees (faculty, staff and student workers), contractors, volunteers, visitors and licensees.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

a. ***Child*** means an individual under the age of 18.

b. ***Child abuse*** means any known or suspected neglect or physical or sexual abuse of a child. The legal definitions of neglect, physical abuse and sexual abuse can be found in Minnesota Statutes Section 260E.03, as further detailed in **Appendix A** to this policy.

c. ***Child pornography*** means any visual depiction, in any form, of sexually explicit conduct or content that involves or appears to involve a child.

d. ***Covered person*** means any person subject to this policy, as set forth in Section II.

e. ***Required Reporter*** means:

- all St. Thomas employees, whether full-time or part-time staff, faculty, clergy, members of a collective bargaining unit, adjunct faculty or temporary staff, **except** for student workers who do not work with children;
- all students who work with children at St. Thomas or through a course, event, program or activity that is sponsored by, affiliated with, or arranged by St. Thomas;
- all members of the St. Thomas Board of Trustees; and
- all persons volunteering at or for St. Thomas.

SECTION IV. REQUIRED REPORTING OF CHILD ABUSE

St. Thomas requires reporting of child abuse and neglect as set forth below. Many Required Reporters are considered mandatory reporters of child abuse under Minnesota law. Minnesota law protects individuals who make reports of child abuse in good faith.

A. REQUIRED REPORTERS MUST REPORT CHILD ABUSE TO LAW ENFORCEMENT

1. Who Must Make Reports to Law Enforcement?

To ensure compliance with mandatory reporting requirements under the law, St. Thomas requires all Required Reporters to report child abuse to law enforcement authorities.

Students and others who are not Required Reporters are encouraged, but not required by this policy, to report child abuse to law enforcement. However, if a student or other person meets the definition of a mandatory reporter under state law, they are expected to fulfill their legal obligations.

In the event of a conflict between this policy and applicable professional ethical rules, such as the Minnesota Board of Psychology Rules of Conduct, the Minnesota Board of Social Work Practice statutes, or the Minnesota Rules of Professional Conduct for attorneys, reporters are expected to follow the applicable professional ethical rules and their mandatory reporter obligations under Minnesota law.

2. What Must Be Reported?

Required Reporters must make a report to law enforcement authorities if the Required Reporter knows or has reason to believe that a child (a) is being neglected or physically or sexually abused or (b) has been neglected or physically or sexually abused within the preceding three years.

3. When Must I Report?

Immediately. Oral reports must be made to law enforcement authorities as soon as possible and in no event later than 24 hours after you become aware of or suspect the child abuse. Legally mandated reporters of child abuse must follow up with a written report within 72 hours (not including weekends and holidays).

4. Who Do I Call?

Reports must be made to the police, the county sheriff, or the local child protection services agency:

Contact	Phone
Emergencies/Immediate Danger	
On Campus – St. Paul and Minneapolis	(651) 962-5555 Public Safety will call 911 and direct officers to appropriate campus location
Off Campus – St. Paul and Minneapolis	911
Rome	113
Non-Emergency Reporting	
Ramsey County Child Protection Services	(651) 266-4500 (651) 291-6795 (After regular hours)
Hennepin County Child Protection Services	(612) 348-3552
St. Paul Police (non-emergency)	(651) 291-1111
Minneapolis Police (non-emergency)	(612) 348-2345
U.S. Embassy in Rome	06 46741

B. COVERED PERSONS MUST REPORT CHILD ABUSE TO ST. THOMAS

1. Who Must Make Reports to St. Thomas, and What Must Be Reported?

All covered persons (including Required Reporters), must make a report to St. Thomas if the covered person knows or has reason to believe that a child (1) is being or has been neglected or physically or sexually abused, and (2) the neglect or abuse meets any one of the following criteria:

- it was committed by a St. Thomas faculty member, staff member, student, trustee or volunteer;
- it occurred on or near any St. Thomas campus (St. Paul, Minneapolis or Rome);
- it occurred off campus, but in connection with a St. Thomas course, event, program or activity;
- it occurred in a space leased or licensed by St. Thomas; or
- it is otherwise connected to St. Thomas in any way.

Reports to St. Thomas are required ***in addition to*** any reports made to law enforcement.

2. When Must I Report?

Immediately. Reports must be made as soon as possible and in no event later than 24 hours after you become aware of or suspect the child abuse.

3. Who Do I Contact?

Students working in field practicum or student teaching settings who know or suspect child abuse occurring at their placement site must follow professional and legal guidance for mandated reporting and make a report to their faculty supervisor.

For all other covered persons, if the child abuse is ongoing or occurred anytime within the preceding three years, the report must be made to St. Thomas Public Safety, which will take any appropriate responsive action in consultation with the Office of General Counsel. If the child abuse occurred more than three years ago, the report must be made directly to the Office of General Counsel.

In the event of a conflict between this policy and applicable professional ethical rules, such as the Minnesota Board of Psychology Rules of Conduct, the Minnesota Board of Social Work Practice statutes, or the Minnesota Rules of Professional Conduct for attorneys, covered persons are expected to follow the applicable professional ethical rules and their mandatory reporter obligations under Minnesota law.

SECTION V. REQUIRED REPORTING OF CHILD PORNOGRAPHY

St. Thomas has zero tolerance for child pornography. The production, distribution, reception or possession of child pornography is a crime. Any covered person who knows or suspects such activities must immediately report them to St. Thomas Public Safety if the activities are:

- on or near any St. Thomas campus (St. Paul, Minneapolis or Rome);
- off campus, but in connection with a St. Thomas course, event, program or activity (other than a field practicum or student teaching setting);
- off campus, in a space leased or licensed by St. Thomas;

- using any St. Thomas property (including, but not limited to, computers, servers, phones, systems, accounts, or other resources); or
- otherwise connected to St. Thomas in any way.

Covered persons also must notify Public Safety if they have reason to believe that a covered person is engaging in these activities in any other location. Public Safety will alert law enforcement and oversee the University's cooperation with the law enforcement investigation.

SECTION VI. QUESTIONS ABOUT REPORTING OBLIGATIONS ENCOURAGED

St. Thomas will seek to fully support individuals who may need to make a report under this policy. If you have questions about whether a report to law enforcement or Public Safety is required, contact Human Resources, the Dean of Students, or the Office of General Counsel. Covered persons also may call the local child protection services office and inquire about whether a report should be made to law enforcement.

Frequently Asked Questions accompany this policy and contain additional information to help covered persons understand legally mandated reporting requirements and protections for individuals who report child abuse or child pornography to law enforcement.

SECTION VII. NO RETALIATION

St. Thomas strictly prohibits retaliation against any person who makes a good faith report under this policy or who participates in an investigation related to a report made under this policy. St. Thomas will take steps to prevent retaliation and will take strong responsive action if retaliation occurs. Any conduct by a covered person that constitutes retaliation or reprisal is subject to disciplinary action, up to and including dismissal, expulsion and prohibition from campus.

Any person who feels they have been retaliated against for making a report under this policy or for participating in an investigation should contact Human Resources or the Dean of Students.

St. Thomas may impose sanctions if it determines that an individual knowingly and in bad faith made a false report under this policy, knowingly provided false information, or intentionally misled a St. Thomas representative or law enforcement during an investigation.

SECTION VIII. VIOLATIONS

Any covered person who violates this policy will be subject to disciplinary action, up to and including dismissal, expulsion and prohibition from campus. For students, faculty and staff, discipline will be administered in accordance with any applicable student, faculty or employee handbook.

Appendix A to Reporting Suspected Child Abuse Policy

FAQ

Date of initial publication: June 2014
Date of latest revision: May 25, 2023

FREQUENTLY ASKED QUESTIONS

A. Who is required to report child abuse and child pornography to St. Thomas?

All St. Thomas students, faculty, staff, trustees, volunteers, contractors, licensees and visitors who become aware of known or suspected child abuse or child pornography on the St. Thomas campus or otherwise involving St. Thomas are required to make an immediate report to St. Thomas, unless this requirement is in conflict with professional rules that apply to the reporter (such as the Minnesota Board of Psychology Rules of Conduct, the Minnesota Board of Social Work Practice statutes, or the Minnesota Rules of Professional Conduct for attorneys). In that case, the reporter must follow the applicable professional ethical rules and their mandatory reporting obligations under Minnesota law.

B. Who is required to report child abuse to law enforcement?

Individuals who are Required Reporters under the policy, or who otherwise are mandatory reporters of child abuse under Minnesota law, must report child abuse to law enforcement authorities.

Under the policy, Required Reporters include all St. Thomas trustees, volunteers and employees (faculty, staff and student workers), other than student workers who do not work with children as part of their job. Student workers who work with children as part of their job, and all other faculty and staff employees, are Required Reporters regardless of whether they are full-time, part-time, clergy, members of a collective bargaining unit, adjunct faculty or temporary staff.

Depending on their personal circumstances, some individuals who are not Required Reporters under the policy might be considered mandatory reporters under Minnesota law. If so, St. Thomas expects those individuals to comply with any legal requirements that apply to them.

C. How do I know if I'm a mandatory reporter of child abuse under Minnesota law?

Minnesota law requires reports of child abuse and neglect by:

1. a professional or delegate of a professional who is engaged in the practice of the healing arts, social services, hospital administration, psychological or psychiatric treatment, child care, education, correctional supervision, probation and correctional services, or law enforcement; or

2. a member of the clergy who received the information while engaged in ministerial duties" provided the information is not privileged under Minnesota Statutes Section 260E.06, subd. 1(a)(2).

See *Minnesota Statutes Section 260E.06*.

All St. Thomas faculty and many St. Thomas staff are professionals or delegates of a professional in the field of education or in one of the other categories listed above. Examples of individuals who should consider themselves mandatory reporters of child abuse under Minnesota law include, but are not limited to:

- All faculty
- All coaches, assistant coaches and other Athletics staff
- All clergy
- All members of the President's Cabinet
- All Academic Advising staff
- All Admissions staff
- All Campus Ministry staff
- All Public Safety staff
- All Student Affairs staff, including (but not limited to):
    - All staff in the Dean of Students Office
    - All Counseling and Psychological Services staff
    - All Health Services staff
    - All Residence Life staff
- Any person who works with children or who supervises students or employees who work with children
- Any other professional or delegate of a professional in the field of education, healing arts, social services, psychological or psychiatric treatment, child care, law enforcement, correctional supervision, and probation and correctional services.

D. What are the definitions of "physical abuse," "sexual abuse" and "neglect"?

The term "physical abuse," "sexual abuse" and "neglect" are specifically defined by Minnesota's mandatory reporting law. The definitions are technical. For that reason, if you are unsure if conduct constitutes abuse or neglect, call the applicable child protection services agency and ask. You may also consult with St. Thomas Human Resources, the Dean of Students or the Office of General Counsel.

The Minnesota Department of Human Services has summarized the definitions of "physical abuse," "sexual abuse" and "neglect" as follows:

- "**Physical Abuse** is any physical injury or threat of harm or substantial injury, inflicted by [a person responsible for a child's care] upon a child other than by accidental means. The impact of physical abuse can range from minor bruises to severe internal injuries and death. Physical abuse does not include reasonable and moderate physical discipline of a child that does not result in an injury."
- "**Sexual abuse** is the subjection of a child to a criminal sexual act or threatened act by a person responsible for the child's care or by a person who has a significant relationship to the child or is in a position of authority."

- "**Neglect** is the most common form of maltreatment; over 60 percent of all reports in 2009 were allegations of neglect. Neglect usually involves the failure of the child's caregiver to:
    - Supply the child with necessary food, clothing, shelter, medical or mental health care, or appropriate supervision
    - Protect the child from conditions or actions that endanger the child
    - Take steps to ensure that a child is educated according to the law.

  Exposing a child to certain drugs during pregnancy and causing emotional harm to a child may also be considered neglect."

These are only summaries of the legal definitions, not complete definitions. For that reason, it's a good idea to ask if you believe conduct may constitute abuse or neglect.

E. What if the abuse or neglect happened in the past?

1. Required Reports to Law Enforcement

Under the policy, Required Reporters must make a report to law enforcement if the Required Reporter knows or has reason to believe that a child has been neglected or physically or sexually abused anytime within the preceding three years. This is consistent with the obligation of mandatory reporters under Minnesota law. Because many St. Thomas students and applicants have been a child (under the age of 18) within the past three years, information they share with a Required Reporter about child abuse may trigger a reporting obligation.

2. Required Reports to St. Thomas

Students working in field practicum or student teaching settings must make reports to their faculty supervisor, regardless of when the child abuse occurred.

For all other covered persons, if the child abuse occurred anytime within the preceding three years, covered persons must make their report to Public Safety. If the child abuse occurred more than three years ago, the report must be made to the Office of General Counsel (651-962-6571).

F. What if rules of professional ethics require me to keep information confidential?

Under Minnesota's mandatory reporting law, many professionals who normally must keep client information confidential under professional ethical rules are required to make reports of child abuse and neglect. In some cases, there may be a conflict between the ethical rules applicable to a professional (like a lawyer or member of the clergy) and the St. Thomas policy requirement to make reports to law enforcement and St. Thomas Public Safety. When faced with these conflicts, covered persons are required to follow any mandatory reporting obligations they have under state law and to comply with applicable professional ethical rules.

G. What if I'm unsure whether to make a report?

If you're unsure whether to make a report, ask. St. Thomas Human Resources (651-962-6510), the Dean of Students (651-962-6050) and the Office of General Counsel (651-962-6571) can help make a determination of whether a report is required under the policy. You also may call the local child protection services agency and inquire about whether a report should be made to law enforcement. It is always better to err on the side of reporting. Please be aware that even if you seek assistance from St. Thomas, you are still responsible for compliance with any mandatory reporting deadlines.

H. Can I just tell my supervisor or a professor?

In most cases, no. Under the policy, all Required Reporters have a personal obligation to report to law enforcement. Mandatory reporters under the law have the same personal reporting obligation. Individuals can fulfill their reporting obligation by making a joint call to law enforcement with another Required Reporter (for example, a Required Reporter can call child protection services together with a staff member in Public Safety, Human Resources, the Dean of Students Office or the Office of General Counsel). Required reporters may also fulfill their obligation under this policy if the Office of General Counsel confirms in writing to the Required Reporter that the Office of General Counsel has made the required report and/or the Office of General Counsel advises that no report is required. Every Required Reporter and other mandatory reporter who knows or suspects child abuse is personally required to ensure that a required report has been made to law enforcement authorities.

Likewise, covered persons have a personal obligation to report directly to Public Safety (or, if the child abuse occurred more than three years ago, to the Office of General Counsel) any child abuse that appears to be connected to St. Thomas in any way. If you are personally aware of known or suspected child abuse and your supervisor or someone else informs you that a report already has been made to Public Safety, you still have an obligation to ensure that Public Safety knows. Call the non-emergency Public Safety number (651-962-5100) to confirm that a report has been made.

Students who work off-campus with children through an internship or other program should follow the program's procedures with respect to reporting child abuse they become aware of through such experience. Many such programs require reporting to a site supervisor, and the supervisor will make the mandatory report to law enforcement. In such cases, students who have been assured that a report has been made need not make an additional report to law enforcement. If the off-site program is a field practicum or student teaching program, a report should also be made to the student's faculty supervisor in accordance with program rules. If the student has any good faith doubts about whether a report was made to law enforcement, the student should consult with the professor or St. Thomas staff member associated with the off-campus program or with the Dean of Students.

I. What protection is there for reporters?

Under Minnesota law, persons who make good faith reports of child abuse to law enforcement (including reports to a child protection services agency) are provided immunity from criminal and civil liability for such reports. In addition, St. Thomas prohibits retaliation by or against any person who makes a good faith report under the policy.

J. What if I don't make a report required by the policy?

Any covered person who fails to make a report required by the policy may be subject to discipline, up to and including termination from employment or expulsion or suspension from St. Thomas. Any discipline will be administered in a manner consistent with any applicable handbook and will be based on the particular circumstances of the situation. If you are a mandatory reporter under Minnesota law, failure to make a report could subject you to criminal liability.

While all covered persons are expected to make reports required by the policy, a covered person who is or has been a direct victim of abuse by the same perpetrator will not be terminated, expelled or suspended for failing to make an immediate report.

Alcohol and Drug-Free University Policy

Policy number: 123
Policy owner: Human Resources

Date of initial publication: August 17, 2023
Date of latest revision: N/A

SECTION I. PURPOSE

This policy is enacted in compliance with the federal Drug-Free Schools and Communities Act of 1989 and the Drug-Free Workplace Act of 1988. The University of St. Thomas seeks to foster moral responsibility and a culture of care that supports the well-being of all community members.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to all students and all employees, including faculty, staff, and student workers.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

a. ***Alcohol*** means alcoholic products persons under 21 are prohibited from possessing and/or consuming under state law.

b. ***Drugs or Controlled Substances*** mean drugs and other substances regulated and/or prohibited under state and/or federal law, including the federal Controlled Substances Act. These substances include but are not limited to illicit drugs such as heroin, cocaine, methamphetamine, LSD, MDMA (Ecstasy), as well as certain prescription medications like opioids (e.g., oxycodone, hydrocodone) and stimulants (e.g., Adderall) when used without a valid prescription. Drugs or Controlled Substances also means all cannabis products, whether lawful or not.

SECTION IV. INDIVIDUAL USE POLICY

Students and employees are prohibited from engaging in the illegal possession, manufacture, use, or distribution of alcohol, drugs or controlled substances, and drug paraphernalia on all University property (indoors and outdoors), in University-supplied vehicles, and as part of University activities and business.

A. Alcohol and Drugs – Students

No student under the age of 21 may use or possess alcohol.

- Students of legal drinking age may possess and participate in responsible consumption of alcohol in university residence halls, in accordance with Residence Life policies.
- Students of legal drinking age living off-campus may participate in responsible consumption in accordance with city and state laws and ordinances. Abuse of these privileges may result in student conduct proceedings by the University.
- Students must comply with the University's Alcoholic Beverages Policy.

The use, possession, manufacturing, and/or trafficking of illegal drugs is prohibited. The University reserves the right to report illegal drug use and may refer a student to criminal or civil authorities in cases regarding trafficking or intent to distribute illegal drugs.

The abuse, misuse, sale, or distribution of prescription or over-the-counter medications is also prohibited. This includes the use of prescription medications not prescribed to the individual by a licensed healthcare provider.

Failure to abide by the above expectations will be addressed through the student conduct process and will result in consequences under the Student Conduct Code, which identifies other alcohol- and drug-related expectations and the potential consequences for violations.

B. Alcohol and Drugs – Employees

The University's Workplace Conduct Policy prohibits the following while on University property or as a part of any University-sponsored event or University-funded activity:

- The unlawful possession, use or distribution of alcohol, drugs, or drug paraphernalia and the possession, use or distribution of cannabis;
- Being under the influence of illicit drugs or impaired by alcohol or cannabis; and
- The unlawful manufacture, distribution, dispensation, possession, or use of controlled substances in the workplace.

Violations of these expectations will result in disciplinary sanctions under the Workplace Conduct Policy, which identifies other alcohol- and drug-related expectations and the potential consequences for violations. Additionally, employees must comply with the University's Alcoholic Beverages Policy.

C. Cannabis – Students and Employees

Although Minnesota state law permits adults aged 21 years or older to possess and consume cannabis under certain circumstances, federal law still generally prohibits the possession, use, or distribution of cannabis on St. Thomas's campus. Therefore, the use, distribution, or possession of cannabis, including products containing THC (such as certain CBD products), is not permitted on St. Thomas property.

SECTION V. RISKS AND SANCTIONS

Alcohol and drug misuse carries a range of short- and long-term health effects and risks, including physical impairment, altered thinking and judgment, addiction, and disease. Information about these risks can be found on the National Institutes of Health's website.

Abuse may negatively impact a person's education, career, finances, and personal relationships. In addition to disciplinary consequences under applicable University policies, illegal use, distribution, or possession of alcohol or drugs could lead to criminal prosecution and penalties under local, state, and federal law, including fines and imprisonment (depending on the offense). Convictions may also result in the denial of driving privileges and government benefits. Below are links to relevant criminal laws and penalties for alcohol and drug offenses:

- Federal Controlled Substances Act, 21 U.S. 801 et al
- Minnesota controlled substances laws and sanctions
- Minnesota law – underage alcohol offenses
- Minnesota law – violations and penalties related to liquor laws
- Minnesota law – driving while impaired, including underage drinking and driving

SECTION VI. ASSISTANCE FOR THOSE SEEKING HELP

St. Thomas encourages members of its community who want or need help to seek assistance.

The Center for Well Being offers clinical and educational services to students seeking help for issues related to their drug and/or alcohol use. The University encourages members of its community affected by or concerned for another person's alcohol or drug abuse to seek confidential assistance at the Center for Well Being. Professional staff can help the concerned individual plan a strategy to address the specific issue.

Employees may seek assistance through the University's Employee Assistance Program. For information about the University's Employee Assistance Program, please refer to St. Thomas's EAP Information, available on OneStThomas. In addition, any member of the University community who is concerned about use, abuse and rehabilitation is strongly encouraged to contact their family physician or health plan.

Lastly, St. Thomas students are expected to care for themselves and others in the St. Thomas community. See the University's Good Samaritan Policy regarding helping an individual impaired by alcohol or drug consumption.

Emergency Notification, Response and Evacuation

Introduction

The University of St. Thomas (UST) is dedicated to providing a safe and secure environment for students, faculty, staff, and visitors. The Higher Education Opportunity Act (HEOA) requires institutions to disclose emergency response policies and evacuation procedures that will be implemented whenever a significant emergency or dangerous situation exists on campus that involves an immediate threat to the health or safety of students, staff or community members.

Policy Statement

It is the policy of the university to be in compliance with the HEOA Emergency Response and Evacuation Regulations.

Reporting an Emergency

All members of the St. Thomas community are urged to report any potential or actual emergency or dangerous situation involving an immediate threat to the health or safety of students, employees or guests that may be occurring on the campus. Members shall call the St. Thomas Public Safety Department emergency number at 651-962-5555.

Institutional Response

The Public Safety Department will initiate the institutional response by immediately investigating these reports. The Public Safety Department may request assistance from other emergency responders e.g. police, fire, emergency management offices or other university departments or units, as necessary, to confirm that a significant emergency or dangerous situation exists on campus that involves an immediate threat to the health or safety of students, staff or community members. Some of these situations may include but not limited to: Examples may include, but are not limited to:

- Bomb threats or other imminent violent threats
- Fires, natural gas leaks and hazardous spills affecting the entire campus
- Building evacuations and shelter in place situations affecting the entire campus
- Biological or pandemic emergency notifications
- Natural disasters
- Power outages and utility failures resulting in an imminent threat
- Campus closure due to declared civil emergency

Emergency Notification

Once a significant emergency or dangerous situation is confirmed on campus that involves an immediate threat to the health or safety of students, staff or visitors the Public Safety Department will notify students, employees and other community members without unreasonable delay. This shall not apply if the Public Safety Department determines that an immediate notification would

place the St. Thomas community or a victim at greater risk or would compromise efforts to contain, respond to or mitigate the threat to the health or safety of students, employees or community members. It is the responsibility of the Public Safety Department to coordinate this notification. It may consult and seek the assistance of other departments or units, as necessary to:

- Determine the content of any notification
- Determine the appropriate campus segments to notify
- Initiate the appropriate notification system
- Continue to update the St. Thomas community during the emergency

Methods of Communication

St. Thomas has several systems in place for communicating emergency information to members of the community. Any or all of the following methods of emergency notification may be used depending on the type and nature of the emergency:

- St. Thomas Emergency Notification System
- University web site
- Voice Mail System
- E-mail System
- Social Networking Sites
- Emergency telephone voice recording
- Public address systems
- Personal communication
- Signage

St. Thomas Emergency Notification System: This is an electronic system for quickly delivering emergency messages to students, faculty and staff. Notifications may be sent via landline phones, cell phones, text messages and e-mail. Messages will be brief, include basic information and provide instructions on how to obtain more details. The St. Thomas Emergency Notification System will be used only for a confirmed significant emergency or dangerous situation exists on campus that involves an immediate threat to the health or safety of students, staff or community members.

All students and employees are encouraged to keep their St. Thomas Emergency notification information up to date in MURPHY Online.
University web site: Updated information following a message notifying the campus of an emergency will be found on the university website, available for the university and general communities and media outlets, if warranted. In cases of extreme emergency, the university has the ability to replace the regular website with a website designed for emergency communications

only. Regular website functionality can be obtained from a link on the emergency website. Unlike some of the methods, this communication vehicle requires the person to be first notified separately to go the site for this information. This is viewed as a secondary level of communication.

E-Mail System: In addition to the Emergency notification system, e-mails may be sent to specific groups through distribution lists or campus wide.

Social Networking Sites: The University has access to social networking sites where notices and updates can be provided. Unlike some of the methods, this communication vehicle requires the person to be first notified separately to go the site for this information. This is viewed as a secondary level of communication.

Emergency telephone voice recording: In addition to the Emergency notification system, a voicemail may be placed on all holders of a University telephone. Once the message is placed on the phone, the person listening would need to acknowledge the message prior to proceeding with the use of the phone.

Text messaging: The university has the ability to send limited information through text messages.

Phone Call: The university also has text to voice ability to call out to inform people of an emergency.

Public address systems: Specific areas and buildings on campus have public address systems which can be used in the case of an emergency to disseminate information. In addition, Public Safety has handheld PA devices and its vehicles are equipped with public address systems which can be used in specific emergencies.

Personal communication: This involves direct contact with people and informing them of the situation and updates. One of the more popular methods to implement this communication is through the use of runners. Also, individual departments and units are encouraged to maintain a variety of forms of personal communication, including phone trees and email lists that can be accessed if needed.

Signage: A variety of signage may be created to help provide directions or instructions. These may include electronic signage for traffic, the posting of written signs, or the use of “A-frame” signs .

Testing

All emergency communications methods are tested on at least an annual basis, according to standards as appropriate.

Fire Evacuation Drills are conducted in all on campus student housing facilities twice an academic year. This test can be either announced or un-announced evacuation drill. An assessment is conducted to determine any issues with the system or evacuation. See attachment C for date each drill was conducted.

Evacuation

In the case of fire alarm, all persons must leave the building by the nearest available exit. Elevators are not to be used. For severe weather or tornado warnings, occupants should go the basement or interior hallways away from widows or glass

Policy Awareness

This policy will be included in the Emergency Guide, which is available electronically at the Department of Public Safety website https://www.stthomas.edu/publicsafety/emergencyguide/.

Building Evacuation during a Fire, Weather Emergency

I. <u>General Evacuation</u>

A. Public Safety recommends members of the community preplan any evacuation. This may include knowing the location of all of the exits, waking alternative routes to the exits, knowing where exit doors lead to, and knowing general safety procedures.

B. In the case of a localized fire alarm (a fire alarm that is limited to a room), the occupants shall leave the room and shut the door.

C. In the case of a full building fire alarm or at the direction of a university or other public safety official, all students, employees, or guests must immediately leave the building or area through the nearest available exit. During the evacuation the person shall:

- Close all of the room's windows;
- Before opening any door, feel the door. If it is HOT, do not open it; if it is not hot, brace yourself against the door, open it slightly, and if heat or heavy smoke are present, close the door and stay in the room. If you are unable to leave the room call Public Safety at 651-962-55555 with your name and location. Also hang something bright in the window to attract attention.
- If the door is not hot, leave immediately and shut the door when you leave. (Do not lock it)
- Do not use any cell phone during the evacuation unless it is an emergency.
- Do not use elevators during an evacuation.
- Exit in an orderly fashion. Do not run or push. Running can lead to falls and injuries.
- Gather at a designated a safe location or distance from the building or area, taking care not to block entrances and exits for other people including emergency personnel. Depending on the nature of the emergency, people may be directed to one of the alternative meeting areas. (See Attachment A for alternative meeting locations.)
- Stay together and assess who is present by gathering names.
- Report the condition and location of any persons unable to leave the building or area or who need assistance to Public Safety or other emergency personnel.

D. Wait for the all clear to reenter the space or proceed to an alternative meeting location or designated shelter.

Evacuation for Individuals with Disabilities during an Emergency

I. <u>Notification of Residence Hall Students with Disability</u>

A. If there is a student living in a residence hall and discloses a mobility disability, the student shall meet with Director of Enhancement Program - Disability Services to discuss emergency evacuation processes including access of elevators during emergencies or malfunctions. This will result in an individualized emergency plan for the student.

B. In these cases, the Director of Enhancement Program-Disability Services will notify the Lead Communications Supervisor and Special Projects Manager of Public Safety and the Director and Associate Directors of Residence Life of the student's name, residence hall and phone numbers. They will keep this information on file in case of an emergency evacuation of the building or elevator malfunction.

C. If there is fire or fire alarm in the student's assigned residence hall, the Public Safety dispatcher will advise the responding officers and one of the officers will go to the room as soon as possible to update the student and determine any assistance that may be needed.

D. In the case of a non-emergency elevator malfunction in a residence hall that Public Safety is aware of, it will notify the on-call Hall Director. This director will notify any student whose name has been forwarded by the Director of Enhancement Program - Disability Services of the malfunction.

II. <u>Mobility Disability Evacuation for Fire</u>

A. In the case of a fire or fire alarm, the person who has a mobility disability and is unable to leave directly from the building or without the assistance of an elevator, the person shall stay in the room with the doors closed. The person should also tell someone who is leaving building to ask for further assistance from Public Safety or the Fire Department. The person may also call Public Safety at 651-962-5555 and advise the dispatcher of the room location and assistance that may be needed.

B. When a Public Safety Officer makes contact with the person, the officer will assess the situation and advise the person that if evacuation of the building is needed and further assistance is required, this will be done by the responding fire department. If required, the officer will immediately notify the fire department of the location of the person and transmit the information to dispatch.

III. <u>Mobility Disability Evacuation for Other Emergencies</u>

A. If there is a severe thunderstorm or tornado warning, the person with a mobility disability shall try to evacuate to the basement or designated shelter in the building. If unable to evacuate, the person will stay in the room and if possible, go into an interior wall area or bathroom. The

person also may call Public Safety at 651-962-5555 and advise the dispatcher of the location and any special assistance they need.

B. Other evacuations for emergencies will be based on the nature of the emergency. Except in a natural gas evacuation, the person may call Public Safety at 651-962-5555 and advise the dispatcher of the room location and assistance that may be needed.

Active Shooter/Gun Shots

- Contact Public Safety 651-962-5555 as soon as possible.
- Provide a description of the person, nature of behavior, and the last known location of the person.
- Public Safety will immediately notify police.
- Do not pull any fire alarm in an attempt to alert other people of the incident or to frighten the suspect

Options for you to consider with an Active Shooter Situation

Run. When an active shooter is in your vicinity:

- If there is an escape path, attempt to evacuate.
- Evacuate whether others agree to or not.
- Leave your belongings behind.
- Help others escape if possible.
- Prevent others from entering the area.
- Call Public Safety at 651-962-5555 when you are safe.

Hide. If you cannot evacuate or get out safely, you need to find a place to hide, remain quiet and calm.

- Act quickly and quietly.
- Try to secure your hiding place the best you can. It should be out of the shooter's view, provide protection if shots are fired in your direction, and not trap or restrict your options for movement.
- Turn out lights, and if possible, remember to lock doors.
- Lock and/or blockade the door.
- Silence your cell phone.
    - Hide behind large objects.
    - Remain very quiet.

Fight. As a last resort, and only if your life is in danger:

- Attempt to incapacitate the shooter.
- Act with physical aggression.
- Improvise weapons.
- Commit to your actions.

When law enforcement arrives:

- Remain calm and follow instructions.
- Keep your hands visible at all times.
- Avoid pointing or yelling.
- Know that help for the injured is on its way.

Bomb Threat

Remain calm.

Use this telephone checklist to record information concerning the bomb threat. Have this list ready for the authorities when they arrive.

Employees or students receiving or discovering a bomb threat or emergency should immediately call the Public Safety Department at 651-962–5555.

The decision to evacuate the building will be based on the credibility of the threat and the nature of the threat.

The Director of Public Safety, in conjunction with Senior Administration, will authorize the evacuation.

If a bomb threat is received by phone, ask:

- When is the bomb going to explode?
- Where is the bomb right now?
- What kind of bomb is it?
- What does it look like?
- Why did you place the bomb?
- Keep the caller on the phone as long as possible!

Record the following information for Public Safety:

- Time of call.
- Date of call.
- Exact words of person.

- Judge the voice: male, female, child, approximate age, do they sound coherent, etc.
- Speech pattern, accent.
- Background noises and description (music, people talking, cars, or trucks, airplanes, children or babies, machine noise, typing, etc.)

What should you do about suspicious mail and packages?

- Do not handle the envelope or package.
- Leave the immediate area.
- Notify Public Safety at (962)-5555 and stop anyone from entering the area where the package is located.

What Will Happen Next?

- Depending upon the circumstances, the Police Bomb Squad may be dispatched to the scene.
- Depending upon the circumstances, a search of the building may be conducted under the direction of Public Safety and the Police.
- The Police Bomb Squad will contact and interview the person who received the bomb threat.
- An evacuation may take place.
- When authorized, the "All Clear" will be given by the Public Safety Department.

Medical Emergencies

Call the university Public Safety Department at 651-962-5555. Give the following information:

- Building location (exact location)
- Type of injury, illness, or symptoms

Do not move a seriously injured person unless they are in a life-threatening situation.

If you notice any jewelry with an inscription indicating medical information, bring this to the officer's attention.

What will happen next?

- Public Safety will respond and assess the situation to determine if it is necessary to notify paramedics.
- Public Safety officers will administer first aid and, if appropriate, prepare for the arrival of emergency units.
- Paramedics and Public Safety officers will administer medical assistance and assist with information, reports, etc.

- If a person does not choose further medical attention, the person will sign a Public Safety Medical Assistance release form.

Missing Student Policy

Policy number: 800-BA-12
Policy owner: Public Safety

Date of initial publication: Not available
Date of latest revision: March 21, 2023

SECTION I. PURPOSE

The purpose of this policy is to establish reporting requirements and notification procedures when a student is missing. This policy is developed in accordance with the Code of Federal Regulations 34 CFR § 668.46 and contains the official notification procedures for the University of St. Thomas concerning missing students, including those who reside in on-campus housing.

SECTION II. SCOPE AND APPLICABILITY

The reporting expectations and procedures set forth in this policy apply to all St. Thomas students, faculty and staff. Other expectations apply to employees in Public Safety, Residence Life and related departments.

SECTION III. DEFINITIONS

When used in this policy, "Missing" means a person has not been seen or made any contact with another and the person's absence is contrary to their usual pattern of behavior and/or unusual circumstances may have caused the absence.

SECTION IV. REPORTING MISSING STUDENTS

A. Reporting a Missing Student Who Resides On Campus

Any student, faculty or staff member shall immediately notify Public Safety if they have reason to believe that a student who resides in on-campus housing has been missing for 24 hours or has been missing for less than 24 hours under concerning circumstances, including but not limited to: the person's medical condition, the location where the person was last seen, weather, possibility that the person is a potential victim of foul play, or reasons to believe the person may be a danger to themselves or others.

B. Reporting a Missing Student Who Resides Off Campus

Any student, faculty or staff member who has concerns that a student who resides off campus may be missing are strongly encouraged to immediately notify Public Safety and/or local police.

C. How to Make a Report

To report a missing person to St. Thomas, call the Public Safety emergency line: 651-962-5555.

A person making a report should try to provide as much information as possible about the missing student, including (if known) name, age, and address, date, time and location the missing person was last seen, medical condition, any physical or intellectual disabilities, any circumstances related to the person's absence and a physical description.

SECTION V. OPTION TO DESIGNATE CONFIDENTIAL CONTACT PERSON(S)

Under federal law, the University of St. Thomas is required to give resident students the opportunity to provide confidentially the name and telephone number of person(s) that can be contacted should they be determined to be missing from campus. St. Thomas asks all students to provide this confidential contact information when registering for class, as part of the address verification process. In addition, resident students are also notified of this opportunity by the Department of Residence Life at the beginning of each semester.

Students can provide or change this information by logging into the Murphy Online Information System, visiting the "Personal Information" section and then adding or updating their "Missing Person Contact/s."

The contact information provided pursuant to this section will be confidential, will be accessible only to authorized campus officials and may not be disclosed except to law enforcement personnel in the furtherance of a missing person investigation. The request for the confidential contact is different than the emergency contact request even though the names supplied by the student may be the same.

SECTION. VI. PUBLIC SAFETY RESPONSIBILITIES

Public Safety is the department primarily responsible for the investigation and response coordination for missing students who reside on campus. Public Safety is also the university's liaison to assist the primary law enforcement agency that has jurisdiction for the investigation of missing students, regardless of whether the student lives on or off campus. As appropriate, Public Safety will consult and seek assistance from other university departments for law enforcement agencies in a missing student case. The Director of Public Safety and Dean of Students will confer and determine if and when the University Action and Response Team (UART) is notified in the case of a missing student.

SECTION VII. RESIDENCE LIFE RESPONSIBILITIES

In the event the Department of Residence Life is contacted concerning a resident student gone missing, Residence Life will gather preliminary information and notify Public Safety. Residence Life will ensure that all Residence Life staff are trained on their obligation to notify Public Safety of a missing student.

Appendix A to Missing Student Policy

Procedures

Date of initial publication: N/A
Date of latest revision: March 21, 2023

SECTION I. PROCEDURES AND COMMUNICATIONS

A. Public Safety Response and Investigation

1. When a report of a missing student is made to Public Safety, Public Safety will take a report and commence a reasonable search based on available information. A reasonable search will include, at a minimum:
   - Gathering information from the person who made the report
   - Attempting to contact the missing student via phone, text and email
   - For on-campus students, performing a health and welfare check in the student's room

   Depending on the circumstances, a reasonable search may also include, but is not limited to, camera review, area search and/or speaking with roommates and/or others. Public Safety may engage other University offices, as appropriate, with respect to this investigation.

2. If a resident student cannot be located, the Director of Public Safety, Dean of Students, and Director of Residence Life will coordinate to notify the local police department and confidential contacts within 24 hours. Police and confidential contacts may be contacted sooner if there are concerning circumstances related to the student's disappearance. If the missing student is under the age of 18, Public Safety will also contact the student's custodial parent or legal guardian no later than 24 hours after the student is determined to be missing.

3. If the student lives off campus, Public Safety may contact police based on the investigation and will also direct the reporting party to contact the police department where the person was last seen or went missing from. Public Safety may also contact the student's confidential contacts.

4. In responding to reports of a missing student case originating from campus, Public Safety will implement the incident command system. The first responding officer will obtain available information about the incident and determine the resources that will be needed. The officer will also notify the supervisor on-duty. The on-duty supervisor will then contact the manager on-duty and update information. The manager on-duty will contact the Director of Public Safety if the person is a student, or the person is missing from campus. They will then coordinate the response and investigation.

5. Public Safety, with the support of Residence Life, will secure any vehicles, computers, residence hall rooms (including rekeying the room), or other personal belongings of a missing resident student that are located on campus.

B. Communication

1. The Director of Public Safetyor designee(s) will coordinate the communication of a missing student to the Dean of Students and the chair(s) of UART, who will then facilitate communications to Marketing Insights and Communications (MIC), Academic Affairs or other appropriate department(s).

2. Any internal or external communication by the university regarding the missing studentwill be coordinated by Public Safety, MIC, and the local police department.

3. MIC or its designee shall serve as the spokesperson of the university to internal and external constituents on these cases.

UNIVERSITY OF St.Thomas

Hazing Policy

Policy number: 609
Policy owner: Vice President for Student Affairs

Date of initial publication: October 20, 2015
Date of latest revision: June 5, 2025

SECTION I. PURPOSE

The University of St. Thomas unconditionally opposes hazing and strives to provide an environment free from the humiliation and danger of hazing.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to students and to student clubs and organizations. In addition, the policy applies to the following individuals, whether or not they are students at St. Thomas:

- all participants in St. Thomas study abroad programs or other St. Thomas travel programs, including VISION trips;
- all persons residing in St. Thomas residential housing, whether or not currently enrolled or working at St. Thomas; and
- all persons who are not officially enrolled for a particular term but intend to return to St. Thomas and/or prospective students.

The individuals identified above are "covered persons." This policy applies to hazing that occurs on or off campus, regardless of where the hazing occurs.

SECTION III. DEFINITION OF HAZING

Hazing is any act, committed on or off campus, that is humiliating, intimidating or demeaning, or endangers the health and safety of a person who is seeking to join, affiliate with, participate in, obtain a leadership position with, or maintain membership in any team, group, or organization. Hazing includes active or passive participation in such acts and occurs regardless of any party's willingness to participate in the activity.

Hazing takes many forms. Some forms may be subtle—for example, occasional name calling or other behaviors that emphasize a power imbalance between prospective members and continuing members or alumni of the group or team. Other forms are much more serious and severe, such as behaviors that cause emotional anguish or physical discomfort to the victim and behaviors that cause physical and/or emotional harm, such as beating, branding, excessive exercise, and forced or coerced alcohol consumption. All forms of hazing are prohibited by this policy.

Hazing may include, but is not limited to, the following:

1. Forced or coerced calisthenics, exercise, or running;
2. Nudity or degrading apparel;
3. Physical punishment (e.g., paddling, hitting, beating, pushing, shoving, or tackling);
4. Exposure to uncomfortable environments (e.g., excessive or repetitive noises, yelling or screaming, bright lights, extreme temperatures, confining quarters);
5. Lack of continuous sleep or sufficient sleep;
6. Required eating of repulsive or spoiled food;

7. Forced road trips, abandonment, “dropping,” or kidnapping;
8. Personal servitude, unreasonable chores, or lengthy work sessions;
9. Assigning “pranks” such as stealing, defacing objects, or harassing another person or organization;
10. Not providing sufficient study time;
11. Using or causing others to use derogatory or degrading names, yelling or screaming, using obscenities;
12. Manipulating or creating situations that involve hypocrisy, deception, or double standards (e.g., telling a person they failed when, in fact, they did not; expecting the person to do anything requested by an active member);
13. Activities that endanger mental or physical health or involve the forced or coerced consumption of liquor or drugs;
14. Conduct that is a crime under local, state or federal law;
15. Academic dishonesty (e.g., cheating, plagiarism, knowingly furnishing false information, forgery);
16. Engaging in or simulating sexual acts;
17. Sexual harassment or other unlawful harassment;
18. Requiring or coercing conduct that is conspicuous and not within community norms; or
19. Alteration or unauthorized use of university documents, records, identification or property.

SECTION IV. HAZING PROHIBITTED

St. Thomas prohibits all forms of hazing. A covered person violates this policy if the person:

1. Engages in hazing;
2. Solicits, encourages, directs, aids, or attempts to aid another in engaging in hazing;
3. Intentionally, knowingly, or recklessly permits hazing to occur; or
4. Has firsthand knowledge of the planning of a specific hazing incident or firsthand knowledge that a specific hazing incident has occurred, and knowingly fails to report this knowledge in accordance with the complaint procedures below.

A team, group, or organization violates this policy if the team, group or organization condones or encourages hazing or if an officer or any combination of members, pledges or alumni of the organization commits or assists in the commission of hazing. An organization may include an unofficial club.

Because of the socially coercive nature of hazing, a person’s implied or expressed consent to an act of hazing is not a defense.

Violations of this policy will result in disciplinary action and may result in criminal prosecution. In addition, individuals may be sued in civil court for mental or physical harm that results from hazing.

If alleged hazing conduct violates this policy and other St. Thomas policy, such as the Sexual Misconduct Policy, the Student Conduct Code, or the Statement on Offensive Behavior, St. Thomas will consider and respond to the conduct under all applicable policies.

SECTION V. REPORTING HAZING

Any individual who believes they were the victim of hazing, or any student, staff, or faculty member who personally observed or has knowledge or belief of conduct that may constitute hazing, is expected to report the possible hazing immediately to the Dean of Students Office, Public Safety, or anonymously by e-mailing PSTIPS@stthomas.edu or calling (651)-962-TIPS (651-962-8477, or 2-8477 on campus).

St. Thomas strongly encourages individuals to report all hazing that may violate criminal laws to the police. St. Thomas will assist complainants of potentially criminal hazing with notifying law enforcement authorities. Reporting hazing to St. Thomas does not require the individual to report the incident or file charges with the police.

Upon request by the police, Public Safety will assist the police in obtaining, securing, and maintaining evidence in connection with potentially criminal hazing conduct.

SECTION VI. NO RETALIATION

St. Thomas prohibits retaliation against individuals for good faith reports of hazing. No student or employee will be reprimanded or retaliated against for initiating an inquiry, submitting an assertion or complaint in good faith, or participating in an investigation related to a claim of hazing. St. Thomas will take steps to prevent retaliation and will take strong responsive action if retaliation occurs. Any conduct constituting retaliation or reprisal is subject to disciplinary action up to and including dismissal and expulsion.

St. Thomas may impose sanctions if it determines a student or employee knowingly initiated in bad faith a claim of hazing, knowingly provided false information, or intentionally misled a St. Thomas representative during an investigation of hazing allegations or a related complaint.

SECTION VII. HAZING PREVENTION AND AWARENESS

St. Thomas actively seeks to prevent hazing and ensure the community is aware of hazing, its impacts, and the university's procedures for responding to hazing. The measures St. Thomas has in place to prevent and raise awareness about hazing include:

- Research-informed, proactive in-person trainings led by the Dean of Students office for various student groups, including required annual hazing trainings for athletic and club sports teams (including athletes and coaches). These trainings seek to provide information on what hazing looks like, provide strategies for preventing or intervening in hazing, raise awareness of St. Thomas's hazing policy (including its definition of hazing, prohibition on hazing, investigation mechanisms, anti-retaliation provision and consequences for violations) and provide information on how to report hazing.Providing research-informed, in-person trainings on an as needed basis to student organizations involved in potential or actual hazing incidents.
- Requiring recognized student club advisors and student club leaders to review information that alerts them to St. Thomas's policy prohibiting hazing.
- Stating in various policies and handbooks distributed to students that hazing is prohibited under St. Thomas policy and referring or linking to the hazing policy in such materials, including the Student Code of Conduct, student-athlete code of conduct and student club handbook.

- Hazing is considered a violation of the Student Conduct Code, which also includes a provision that failing to intervene, prevent or report acts of hazing also violates the Code.
- Publicly posting this policy on St. Thomas's policy webpage.
- Collecting and publicly posting or reporting statistics on hazing as required by federal law.

SECTION VIII. APPLICABLE STATE AND LOCAL LAWS

Under Minnesota Statute 135A.155, St. Thomas and other private colleges in Minnesota are required to adopt and publicly post a policy on hazing, including mechanisms for reporting incidents and disciplinary actions for violations. This document serves as St. Thomas's statutorily-required hazing policy.

Appendix A to Hazing Policy

Response and Resolution Process

Date of initial publication: October 20, 2015
Date of latest revision: June 5, 2025

The provisions below describe the process St. Thomas generally follows to investigate and adjudicate reports of hazing. These provisions are intended to be flexible so as to allow St. Thomas to fulfill its educational mission and maintain a safe, non-discriminatory learning environment. The Dean of Students has discretion to authorize departures from these provisions when warranted by the circumstances.

SECTION I. ON-CAMPUS PLACES TO REPORT HAZING

Dean of Students
Room 241, Anderson Student Center
www.stthomas.edu/deanofstudents
(651) 962-6050

Department of Public Safety
www.stthomas.edu/psps
24-Hour Emergency – (651) 962-5555
Department of Public Safety - (651) 962-5100 (non-emergency)

Anonymously by e-mailing PSTIPS@stthomas.edu
or calling (651) 962-TIPS (651-962-8477)

SECTION II. RESPONSE AND RESOLUTION OF HAZING REPORTS

When St. Thomas becomes aware of possible hazing, it will take steps promptly to protect the parties and respond.

A. INTERIM ACTION

The Dean of Students and/or their designee(s) (each a "Responsible Individual") may take interim action(s) as they deem reasonably necessary and appropriate to protect the St. Thomas community. For example, the Responsible Individual(s) may prohibit any person accused of hazing from physically entering or being on St. Thomas property or may change a complainant's or respondent's on-campus residency, student status, or work or class schedule. When allegations of hazing are made against a team, group, or organization, the Responsible Individual(s), in consultation with appropriate St. Thomas administrators, may impose restrictions on the activities and events of such team, group, or organization.

B. INVESTIGATION AND DETERMINATION

The Responsible Individual(s) will make a preliminary review of the complaint to determine whether the incident of alleged hazing merits further investigation.

1. If after the preliminary review, the Responsible Individual(s) determine circumstances do not warrant further investigation or process, the matter will be closed.
2. If after the preliminary review, the Responsible Individual(s) determine further investigation is warranted, the Responsible Individual(s) will initiate a factfinding investigation into the matter. The investigation will be conducted by one or more factfinder(s) designated by the Responsible Individual(s). The investigation will include, at a minimum, notice to a responding individual, club or organization of the reported hazing and an opportunity for the individual/club or organization to respond to the report and share their perspective on what occurred.
3. The factfinder(s) will weigh the evidence and determine whether it is more likely than not (a "preponderance of the evidence" standard) this policy was violated and by whom. The outcome and conclusions of such an investigation shall be documented in a written report submitted to the Responsible Individual(s).

C. RESPONSIVE ACTION BY ST. THOMAS

The Responsible Individual(s) will review the factfinder's report. If it is determined the acts alleged in the written report do not rise to the level of hazing, or there is not enough information to determine hazing has occurred using a preponderance of the evidence standard, the matter will be closed. If it is determined that it is more likely than not that hazing occurred, the Responsible Individuals will work with the appropriate St. Thomas administrators to determine what, if any sanctions will be imposed or other action will be taken by St. Thomas.

Not all forms of hazing will be deemed equally serious offenses, and St. Thomas may impose different sanctions depending on the severity of the offense, taking into account any previous conduct violations. For individual violations, such sanctions may range from a formal warning up to and including suspension or expulsion from St. Thomas. For team/group/organization violations, such sanctions may range from a formal warning up to and including withdrawal of formal recognition of the team, group, or organization by St. Thomas. Findings of a policy violation may lead to individual sanctions and team/group/organization sanctions based on the same hazing incident.

In cases in which the Responsible Individual is considering a possible sanction of suspension or expulsion of a student or withdrawal of recognition of a team, group or organization, the Responsible Individual may, if they choose, appoint a Student Conduct Board to review the factfinder's report and make a recommendation regarding sanctions.

Such sanctions and determinations shall be recorded in writing and maintained by the Responsible Individual(s) in accordance with applicable record retention requirements.

D. APPEAL PROCESS

Determinations of policy violations and sanctions may be appealed using the process below.

1. Grounds for Appeal

An individual, club or organization found responsible for violating this policy may appeal the results of the formal process if they believe:

a. a procedural error occurred that substantially affected the outcome of the process;

b. the decision was arbitrary and capricious;

c. significant new factual material not available to the factfinder(s) that could have affected the original outcome was discovered; however, intentional omission of factual information by the appealing party is not a ground for appeal; or

d. the sanction or other response by St. Thomas was excessively severe.

2. Submitting an Appeal

A signed, written request for an appeal must be submitted to the Appeal Officer (see below) within ten (10) working days following the date of notification of the outcome of the investigation.

3. Appeal Officer

The Vice President for Student Affairs is the Appeal Officer. In cases involving a potential conflict of interest or other issue preventing the designated individuals from serving as an Appeal Officer, St. Thomas may appoint an alternate Appeal Officer.

4. Consideration of Appeal

The Appeal Officer may consider the appeal directly or the Appeal Officer may, at their discretion, appoint an appeal board (consistent with the procedures herein). The appeal board (or Appeal Officer, if no appeal board has been appointed) will not rehear the case but will consider whether it is more likely than not the above-listed grounds for appeal have been satisfied.

The appeal board (or the Appeal Officer, if no appeal board has been appointed) will review the appeal, the fact-finding report, and consider any previously undiscovered evidence (if discovery of new evidence is a ground for appeal). In addition, the appeal board (or the Appeal Officer, if no appeal board has been appointed) may meet with the parties and consider other additional information at the discretion of the appeal board or Appeal Officer.

If an appeal board is used, the appeal board will provide the Appeal Officer with a written report of its findings of whether the above-listed grounds for appeal have been satisfied and, if so, a recommendation as to whether St. Thomas should remand the matter or take any different or additional action than originally determined. Such report shall be provided to the Appeal Officer no later than fifteen (15) working days following submission of the appeal. The Appeal Officer will give careful consideration to the recommendation of the appeal board, but shall not be bound by it.

The Appeal Officer will notify the appellant in writing of the appeal board or hearing committee's findings and recommendation and the final disposition of the appeal within ten (10) working days following receipt of the appeal board's findings and recommendations. If no appeal Board is used, the Appeal Officer shall issue a written decision stating the Appeal Officer's findings and the final disposition of the appeal within ten (10) working days following receipt of the appeal. The Appeal Officer's decision shall be final.

5. No Further Appeal

Appeals arising out of alleged violations of this policy must be made under this appeal process and are not eligible for consideration under faculty, staff, or student grievance policies or processes.