

Annual Security

Report 2015

INTELLITEC COLLEGES - COLORADO SPRINGS CAMPUS

AMENDED 3/31/16

Offense	Year	On-Campus Property	Public Property
Murder / Non-negligent Manslaughter	2012	0	0
	2013	0	0
	2014	0	0
Negligent Manslaughter	2012	0	0
	2013	0	0
	2014	0	0
Sex Offenses, Forcible	2012	0	0
	2013	0	0
	2014	0	0
Sex Offenses, Non-Forcible	2012	0	0
	2013	0	0
	2014	0	0
Robbery	2012	0	0
	2013	0	0
	2014	0	0
Aggravated Assault	2012	0	0
	2013	0	0
	2014	0	0
Burglary	2012	0	0
	2013	0	0
	2014	0*	0
Motor Vehicle Theft	2012	0	0
	2013	1*	0
	2014	0*	0
Arson	2012	0	0
	2013	0	0
	2014	0	0
Stalking	2012	0	0
	2013	0	0
	2014	0	0
Dating Violence	2012	0	0
	2013	0	0
	2014	0	0
Domestic Violence	2012	0	0
	2013	1*	0
	2014	0	0
Arrests: Weapons: Carrying, Possessing, etc.	2012	0	0
	2013	0	0
	2014	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, etc.	2012	0	0
	2013	0	0
	2014	0	0
Arrests: Drug Abuse Violations	2012	0	0
	2013	0	0
	2014	0	0
Disciplinary Referrals: Drug Abuse Violations	2012	0	0
	2013	0	0
	2014	0	0
Arrests: Liquor Law Violations	2012	0	0
	2013	0	0
	2014	0	0
Disciplinary Referrals: Liquor Law Violations	2012	0	0
	2013	0	0
	2014	0	0

No hate crimes were reported for the years of 2012, 2013 or 2014.

IntelliTec Colleges does not have on-campus housing or residential facilities or any non-campus buildings that qualify for reporting.

*IntelliTec Colleges amended the following items on 3/29/16: 2013 - motor vehicle theft changed from 0 to 1 to include joyride incident misclassified. 2013 - Domestic Violence change from 0 to 1 to include an incident of domestic violence. 2014 - Burglary changed from 1 to 0 to remove larceny incident misclassified. 2014 - motor vehicle theft changed from 2 to 0 to correct thefts from vehicles misclassified as theft of vehicles.

Campus Crime and Clery Act Compliance Policy

Version: 2.0

Approved: March 29, 2016

Effective: March 31, 2016

1 Policy Statement

IntelliTec Colleges (“IntelliTec”) shall comply with all requirements of the Clery Act. This policy sets forth guidelines and procedures intended to ensure IntelliTec’s ongoing compliance with the Clery Act’s crime reporting and disclosure obligations, and its obligation to make available to the campus community and the public, campus security and safety policy statements as prescribed by the law.

IntelliTec shall:

- Compile and disclose statistics of reports of the types of crimes specified in the Clery Act (“Clery Crimes”) for its campuses, the immediately adjacent public areas and public areas running through the campuses, and remote classroom facilities;
- Collect available information on reports of Clery Crimes made to local law enforcement, school officials, and others associated with IntelliTec who have “significant responsibility for student and campus activities”;
- Submit an annual report to the Department of Education with statistics of Clery Crimes for the last three years and IntelliTec policy statements addressing campus security and safety (“Clery Report”);
- Issue warnings of any Clery Crime that may be an ongoing threat to the campus in a timely manner, so that individuals may take steps to protect themselves and to aid in the prevention of similar crimes;
- Conduct educational programs to promote awareness.

2 Scope

This policy applies to all IntelliTec personnel who have responsibility for an aspect of campus security and all offices and individuals with significant responsibility for student and campus activities. Individuals responsible for student and campus activities and others who, as a result of their role and duties, may be classified as Campus Security Authorities (“CSA”) under the Clery Act have specific crime reporting obligations under the law. This policy applies to all IntelliTec locations which are considered part of the Clery Act geography.

3 Definitions

Annual Security Report (ASR)- Also known as Clery Reports or Crime Reports. The Clery Act requires IntelliTec to annually submit a report to the Department of Education containing the following: statistics for Clery Crimes by type location and year; campus safety and security related policy statements that address crime reporting and prevention; law enforcement databases of registered sex offenders; drug, alcohol and sex offenses; procedures for issuing timely warning to the campus of potentially dangerous criminal and emergency situations; and campus evacuation procedures.

Arrest – Persons processed by arrest, citation or summons. IntelliTec shall compile statistics for and specifically disclose arrests related to weapons and drug and alcohol abuse. If an individual is both arrested and referred for disciplinary action for an offense, only the arrest will be disclosed.

Referral for Disciplinary Action – IntelliTec Colleges shall compile statistics for and specifically disclose student and employee referrals for disciplinary action related to weapons and drug and alcohol abuse. If an individual is both arrested and referred for disciplinary action for an offense, only the arrest will be disclosed.

Emergency Notification – Requirement to make emergency notifications of emergency events and dangerous conditions occurring on campus or that present an imminent threat to the campus.

Campus Security Authority (CSA) – Used in the Clery Act to identify persons at IntelliTec who, as a result of their job duties, have an obligation under the law to disclose all alleged Clery Crimes that are reported to them which they conclude have been made in good faith. Such persons making the notifications need not be an employee of IntelliTec, such as students and outside volunteers. CSA's are defined by their job duties and function; not by job title. While an individual's ordinary responsibilities and functions at IntelliTec would not classify them as a CSA, the individual may take on a responsibility which would then qualify them as a CSA, for example, if an employee or volunteer organizes or helps lead a student trip or outing.

There are three general categories of CSA:

1. Any individual(s) who is responsible for an aspect of campus security. These individuals are responsible for monitoring access to IntelliTec property.
2. Any individual or organizational unit at IntelliTec to which students and employees should report criminal offenses.
3. IntelliTec officials who have significant responsibility for student and campus activities. The Clery Act broadly defines the term "official" as "any person who has the authority and duty to take action or respond to a particular issue on behalf of the institution."

For example, the Program Supervisors, Director of Education (DOE), Associate Director of Education (ADOE), and Campus Director are IntelliTec officials who have significant responsibility. There may be other individuals that qualify but these are the most common.

Clery Crimes – IntelliTec must compile statistics of reports made to CSA's and local law enforcement of the following types of crimes: aggravated assault; arson; burglary, motor vehicle theft, murder and non-negligent manslaughter, negligent manslaughter, robbery, forcible and non-forcible sex offenses, stalking, domestic violence, dating violence, and hate crimes.

Dating Violence – Acts of violence including threat or intimidation that harm or injure and are committed by a person who has been or is in a romantic or intimate relationship with the victim. Whether a relationship exists will depend on the length, type, and frequency of interaction. These acts include, but are not limited to, sexual or physical abuse or the threat of such abuse. Dating relationship violence can be a single act or pattern of behavior.

Domestic Violence – Felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner, current or former cohabitant, a person with whom a victim shares a child in common,

a person similarly situated to a spouse under domestic or family violence law, or anyone else protected under domestic or family violence law. A “household” exists when individuals who are married or have an intimate relationship share access to the same private living space or bathroom.

Hate Crime – Clery Crimes and any incidents of larceny-theft, simple assault, intimidation, or destruction/damage/vandalism of property that are motivated by bias toward race, gender, religion, sexual orientation, ethnicity/national origin, and disability.

On Campus Property - Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to that described in the first part of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

Public Property - All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Reported Crime – IntelliTec shall compile and publish statistics of “reported” Clery Crimes. For purposes of the Clery Act, a crime is reported when it is brought to the attention of a CSA or local law enforcement by a victim, witness, other third party or even the offender. Information about the crime does not need to be explicit. It does not matter whether the persons involved with the crime or making a report are associated with IntelliTec. If a CSA believes that there is a reasonable basis to conclude the information is not just rumor or hearsay (the information about the crime was provided in “good faith”) he or she should document the reported information pursuant to IntelliTec procedure.

Sex Offenses (Forcible) – Any sexual act directed against another person, forcibly and/or against that person’s will, or not forcibly or against the person’s will where the victim is incapable of giving consent (e.g. forcible rape, forcible sodomy (oral or anal intercourse), sexual assault with an object, and forcible fondling (touching of the private body parts of another person for the purpose of sexual gratification). Disclosure of reported offenses is required.

Sex Offenses (non-forcible) – Unlawful non-forcible sexual assault (e.g. incest, statutory rape). Disclosure of reported offenses is required.

Stalking - Stalking is a course of conduct (i.e., more than one act) directed at a specific person which would cause a reasonable person to feel fear, to experience substantial emotional distress, or to fear for their safety or the safety of a third person. Acts that together constitute stalking may be direct actions or may be communicated by a third party, and can include, but are not limited to, threats of harm to self, others, or property; pursuing or following; non-consensual (unwanted) communication by any means; unwanted gifts; trespassing; and surveillance or other related types of observation.

Timely Warning - IntelliTec must timely alert the campus community to Clery Crimes. Even if all of the facts surrounding the criminal incident(s) are not yet available a warning will be issued as soon as pertinent information is available to enable individuals to take precautions to protect themselves and to prevent similar crimes from occurring.

4 Clery Act Reporting & Crime Statistics

IntelliTec compiles statistics of reported crimes from CSA's and local law enforcement for the ASR. Copies of the prepared reported are provided to the following:

1. Human Resources: For distribution to all new and current employees.
2. Academics: For distribution to all new and current students.
3. Posted on Internet site under Consumer Right-to-Know.

Students and employees are notified via email regarding the availability and exact URL location of the Annual Campus Report data.

4.1 Gathering and Compiling Statistics of Clery Crimes

IntelliTec will collect and compile statistics regarding Clery Crimes. Each campus will coordinate with local law enforcement to gather crime statistics which occur on public property adjacent to, or on the defined Clery geography for each campus. IntelliTec Colleges does not have any on-campus housing or residential facilities or have any non-campus buildings that require reporting. In addition, IntelliTec does not officially recognize any student organizations with off-campus locations.

The statistics are collected from each campus via an incident report and from local law enforcement via annual requests. Data is compiled by the Clery Act Coordinator and submitted to the Department of Education as required by no later than October 1st of each year.

4.2 Clery Report

The Annual Security Report (ASR) will be published and distributed by October 1st of each year. The ASR must be distributed to all currently enrolled students and all employees in the following manner:

The Annual Security Report will be published on IntelliTec's Internet website at the following urls:

Albuquerque	http://www.intellitecollege.com/your-right-to-know/healthSafety_AnnualSecurityReport_al.pdf
Colorado Springs:	http://www.intellitecollege.com/your-right-to-know/healthSafety_AnnualSecurityReport_cs.pdf
Grand Junction:	http://www.intellitecollege.com/your-right-to-know/healthSafety_AnnualSecurityReport_gj.pdf
Pueblo:	http://www.intellitecollege.com/your-right-to-know/healthSafety_AnnualSecurityReport_pb.pdf

An email (*See Sample Email Notice Section 8.5*) will be sent to all student body and employees notifying of the release of the Annual Security Report each year by October 1st. The notice will include: a statement of the report's availability; a list and brief description of the information contained in the report; the exact address (URL) of the Internet or Intranet website at which the report is posted; and a statement that the school will provide a paper copy of the annual security report without fee upon request, written or otherwise.

The ASR will be provided to prospective students and prospective employees upon request. If the ASR is provided to prospective students and prospective employees by posting the report on an Internet site, the notice provided to each individual will include: the exact URL where the report is posted; a brief description of the report; and a statement that the institution will provide a paper copy of the report upon request.

4.3 Records Retention

The supporting records used in compiling the report shall be retained for three years from the latest publication of the report to which they apply. Records to be kept include, but are not limited to, copies of crime reports; records for arrests and referrals for disciplinary action; timely warning and emergency notification reports; documentation, such as letters to and from local police having to do with Clery Act compliance; letters to and from Campus Security Authorities; correspondence with the Department of Education regarding Clery Act compliance; and copies of notices to students and employees about the availability of the annual security report. All documentation should be dated.

4.4 Submitting Crime Statistics to the Department of Education (DOE):

IntelliTec is required to submit the crime statistics from the Clery Report. During late summer, the Department of Education (DOE) conducts the annual Campus Safety and Security Survey. This Web-based survey is used to collect the statistical data from the ASR. The data is then posted on the DOE public website for use by higher education consumers. The site is located at <http://www.ope.ed.gov/security>. Each year a few weeks prior to the collection, DOE sends a letter and a registration certificate to IntelliTec. The certificate contains information necessary to access the survey and enter data.

5 Emergency Responses and Evacuation Procedures

5.1 Fire/Evacuations

1. In the event of a fire or emergency which threatens life or limb, **DIAL 911 IMMEDIATELY**. Employees may make an attempt to extinguish a fire using either a fire extinguisher or other fire control device. In the event the fire is not controllable, take action to evacuate the building as soon as possible after discovery of the fire. In buildings equipped with a fire alarm, trigger the fire alarm. In any event, an Administrator and/or Safety Committee member must be notified as soon as it is safe to do so.
2. **Evacuation:** When the building evacuation/fire alarm is sounded, walk quickly to the nearest EXIT and alert others to do the same. Close all doors to confine the fire. Assist the disabled in exiting the building. Smoke is the greatest danger in a fire, if needed, stay near the floor and crawl to the exit. Once outside, walk with your instructor to the location designated for your respective class. Stay with your class/instructor until you are directed otherwise. Keep streets, fire lanes, hydrants and walkways clear for emergency personnel. **NOTE:** In the event you become trapped in a building during a fire, stay near the floor where the air will be less toxic. Shout at regular intervals to alert emergency crews of your location.
 - Do not use elevators during an evacuation.
 - Do not take any personal items with you during the evacuation. During cold weather bring a jacket if it is immediately accessible.
 - Do not make any stops during your exit; proceed immediately out to your designated Assembly Point.

Instructors are to take their Evacuation packet to their designated area. Check your roster to ensure that all your students are accounted for. When this has been confirmed, the instructor is to raise the Green Card, included in the evacuation packet, to indicate to officials that all students from a given class have been accounted for.

3. **Assembly points:** Outdoor assembly areas shall be designated and shall be located a minimum of 500 feet from the building evacuated so as to avoid interference with fire and emergency department operations. The assembly areas shall be arranged to keep each class separate to provide accountability of all individuals.

4. **Staff and student training:** Employees and students must be trained in fire and crime prevention safety and fire extinguisher training annually.
5. **Fire & Evacuation Exits:** IntelliTec posts building floor plans showing fire and evacuation exit routes and locations of fire extinguishers. Tampering with posted exits plans is prohibited. Fire exits or any emergency egress may not be blocked or tampered with in any fashion. Items, including furniture and bicycles, may not be stored in or near exits or in fire stairwells.
6. **Fire Extinguishers:** All extinguishers shall be checked monthly, by a qualified individual, for readiness and inspected annually by an outside service.

5.2 Fire Drills/Evacuation Drills

1. Fire and evacuation drills will be conducted on a periodic basis occurring no less than once per year. Fire drills will be held for each building. Individual drills will be held for each building and should be conducted in a manner which periodically requires employees to exit by secondary exit routes. Drills should be conducted at different times of the day; however, drills should be scheduled during times when a majority of the employees are available to respond to the drill. The exception to this rule would be in the case of shift work where it is necessary to determine the actions of employees on a particular shift.
2. Procedure: Emergency evacuation drills shall involve the actual evacuation of all staff, students, and visitors to a selected assembly point and shall provide staff, students, and visitors with experience in exiting through all required exits. All required exits shall be used during emergency evacuation drills.
3. The Emergency Evacuation Coordinator (EEC), Safety & Health Director, or Designated Safety Representative should be notified in advance of any drill. Personnel conducting drills and tests shall make proper coordination with emergency response personnel and their Fire Department (or other reporting agency) as necessary to ensure emergency services are aware of the drill. Employees should not have prior notification of Fire/Evacuation Drills.
4. Upon conclusion of a drill, the effectiveness will be evaluated to include a description of the exercise, the date it was held, when it started and ended, and whether or not the drill was announced or unannounced.

5.3 Emergency Notifications

Campus Directors are responsible for issuing emergency notifications. The Director will evaluate the situation and determine if there is an immediate or imminent threat to life or property. To do so, the Campus Director will evaluate all relevant information, and /or rely on outside expertise such as law enforcement or emergency agencies. In the event that the Campus Director is unavailable, the on-shift manager will take responsibility for the evaluation. In the event that an emergency notification needs to be issued for any portion of our campus, the entire campus will be notified due to the small size of the campus geography.

IntelliTec will issue an emergency notification upon the confirmation of a significant emergency or dangerous situation occurring on the campus involving an immediate threat to the health or safety of students or employees. Text based notification systems and IntelliTec's email system will be used to issue the necessary emergency notifications. When appropriate, the same system will be used to issue an all clear notification (*See Appendix: 8.3 Sample Emergency Response Statement*).

IntelliTec Colleges 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 responsible authorities, compromise efforts to assist a victim or to contain,

respond to or otherwise mitigate the emergency. IntelliTec will notify the campus community as soon as it is confirmed that a significant emergency or dangerous situation exists, and will:

- Take into account the safety of the campus community,
- Determine what information to release about the situation, and
- Begin the notification process.

Depending on the situation, the content of the emergency notification may differ but in general will include the current situation and the immediate steps to be taken in response to the situation. In the event that the emergency requires law enforcement or additional emergency department involvement, the school will notify the required emergency services.

IntelliTec may not immediately issue a notification for a confirmed emergency or dangerous situation if doing so will compromise efforts to:

- Assist a victim,
- Contain the emergency,
- Respond to the emergency, or
- Otherwise mitigate the emergency. An example of not compromising efforts to mitigate the emergency might be agreeing to a request of local law enforcement or fire department officials.

5.4 Timely Warnings

When determining whether or not to issue a timely warning, the Campus Director will make a case by case decision based on the following items:

- The nature of the crime,
- The continuing danger to the campus community,
- And the possible risk of compromising law enforcement efforts.

When issuing a timely warning, IntelliTec will issue sufficient information including:

- Information required for members of the campus community to protect themselves,
- All information that promotes safety,
- Information to aid in the prevention of similar crimes,
- And information about the crime that triggered the warning.

The IntelliTec email system will be used to provide timely warnings for any Clery item that represents an immediate threat to students or staff at IntelliTec (*See Appendix: 8.2 Sample Timely Warning*).

6 Campus Policies and Procedures

6.1 Access to Campus Facilities

During business hours, IntelliTec will be open to all individuals who require access to the campus for schooling and business related needs. During non-business hours, access is restricted to employees or contractors with prior authorization only. Students are not allowed into IntelliTec facilities outside of business hours or without IntelliTec employee oversight. IntelliTec Colleges does not have any student housing or residences.

IntelliTec Colleges conducts monthly safety inspections of all facilities to ensure they are properly maintained and secure. Any safety concerns discovered are promptly addressed.

6.2 Security Personnel

IntelliTec Colleges may employ security personnel at campuses as required. IntelliTec does not have any law enforcement personnel; as such, security personnel cannot make any arrests but can contact local law enforcement in the event they feel there is any threat to person or property.

Any security personnel contracted by IntelliTec do not have any formal agreements with local law enforcement agencies to include Memorandums of Understanding (MOU) or any other type of written agreement.

6.3 CSA Identification & Reporting Procedures

Because personnel and job positions change, someone who is a CSA one year may not be a CSA the following year. To determine which individuals are CSAs, the function served by that individual must be considered. If someone has significant responsibility for student and campus activities, he or she is considered a CSA.

The Clery Act Coordinator works with IntelliTec Colleges offices and individuals to identify individuals whose functions qualify as a CSA and informs IntelliTec and personnel of their Clery Act obligations, and the IntelliTec's procedures for collecting information about Reported Crimes.

We do not employ any confidential resources that meet the exemption for professional and pastoral counselors. As such, any reported crimes cannot be treated as confidential and will be included in Clery Act statistics and may invoke the Title IX or additional procedures including law enforcement contact depending on the nature of the crime. If a student or employee does not want to make a formal report, they may contact LifeWorks, The Student and Employee Assistant Program, for confidential counseling and referral services (*for additional information, please see IntelliTec College's Title IX Policy.*) Reports will be handled as confidentially as possible with only those with a need to know being informed.

CSA's must document and report any alleged crimes that they are notified of by students or employees. CSA's who are unsure whether an incident is a Clery Act crime should report it. CSA's are not responsible for determining authoritatively whether a crime took place. CSA's must complete the digital form titled, "Campus Security Reporting Form" available via Google forms.

IntelliTec strongly encourages any victims or anyone who has witnessed a crime to report them to the police and to the school. Any reports given to the police will become a matter of public record.

6.4 Reporting Crime

Emergency situations should be reported by calling 911. Non-emergency crimes should be reported to a CSA (including but not limited to, Program Supervisor, DOE, ADOE, or Campus Director) immediately. If a crime has occurred, IntelliTec encourages students and staff to report to a law enforcement agency. Internally; the situation or event will be evaluated to determine if a timely and/or emergency warning is needed and the necessary information will be collected for the Clery Act Crime Reporting requirements.

6.5 Drug & Alcohol Policy

IntelliTec Colleges is a drug and alcohol free campus. Additional details are available in the Drug and Alcohol Policy available at the following website url: http://www.intelliteccollege.com/your-right-to-know/healthSafety_DrugsAlcohol.pdf. Violators of this policy are subject to IntelliTec disciplinary actions, criminal prosecution, and fines and imprisonment. The possession of alcohol by anyone

under the age of 21 is illegal. Possession of drugs as defined in the Drug and Alcohol policy, including medicinal and recreational marijuana, regardless of state regulations, is not allowed and is a violation of IntelliTec policy.

Drug and Alcohol Abuse Programs: see Drug & Alcohol Policy

6.6 Disclosures of Disciplinary Proceedings

IntelliTec Colleges will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary process conducted by IntelliTec against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased, IntelliTec will provide the results of the disciplinary process to the victim's next of kin, if so requested.

6.7 Sex Offender Registry Database

In accordance with the "Campus Sex Crimes Prevention Act of 2000" which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974, IntelliTec Colleges provides the following link to the National Sex Offender Public Website: <http://www.nsopw.gov/> NSOPW is managed by the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking (SMART) as authorized by the Sex Offender Registration and Notification Act (SORNA) and provides links to each states sex offender registry as applicable.

7 Prevention, Education and Training

7.1 Student and Employee Training

During orientation, students and employees are notified of general campus security policies and sexual assault and violence policies. *(See IntelliTec Colleges' Title IX Policy for more detailed information).* IntelliTec strives to encourage students and staff to be aware of their responsibility for their own security and the security of others. Additional training includes who is considered a CSA, how to report a crime, and policies regarding evacuation, emergency notifications and timely warnings.

Mandatory student and employee education includes:

- New Student Orientation Outlining Campus Security and Prevention,
- Annual Student Training and Education regarding school policy & prevention,
- New Employee Orientation Outlining the Clery Act and Campus Security,
- Annual Employee Training regarding school policy and prevention.

In addition, potential student and staff training may include:

- Guest speakers and Community advocates,
- Participation in Community events,
- Participation in Awareness Month events (Sexual Assault, Domestic Violence, etc.),
- And other on-site resources as needed.

7.2 CSA Training

CSAs shall receive Clery Act training on a regular basis. Training will include a summary of CSA duties and responsibilities, a review of the Clery Act Compliance Policy, reporting requirements, how to report, and other topics of relevance. Additional training will include gathering and compiling internal and external sources, the definition of "Clery geography," and other information including prevention and education.