



SOVAH

Radiologic Technology Program

2017 Annual Security Report

HOW TO REPORT EMERGENCIES ON CAMPUS

Any form of violence or crime that takes place on the School premises must be reported to the local police department. Any form of violence or crime that takes place on a hospital's premises must be reported to the security department of that hospital. The Program Director must issue immediate timely warnings for incidents reported to the School that are confirmed to pose a substantial threat of bodily harm or danger to members of the hospital or campus community. The School will ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. Certain campus officials have a duty to report sexual assault, domestic violence, dating violence, stalking among other criminal acts for federal statistical reporting purposes (Clery Act). All personally identifiable information is kept confidential, but statistical information must be passed along to the Campus Security Authority (CSA) regarding the type of incident and its general location (on or off-campus, in the surrounding area, but no addresses are given) for publication in the Annual Security Report. This report helps to provide the community with a clear picture of the extent and nature of campus crime, to ensure greater community safety. Mandated federal reporters include: local police, Human Resources staff, and any other official with significant responsibility for student activities. The information to be shared includes the date, the location of the incident (using Clery location categories) and the Clery crime category. This reporting protects the identity of the victim and may be done anonymously.

If a reporting party would like the details of an incident to be kept confidential, the reporting party may speak with:

- On-site:
 - Darlene Hankins, Pastoral Care Services
(434) 799-4473
 - Ray Garassino, License Clinical Social Worker
(434) 799-3782
 - Kesshia Brown, License Professional Counselor
(434) 799-2242
- Off-campus: (A List of Community Resources are in the Appendix)
 - Licensed professional counselors

- Local rape crisis counselors
- Domestic violence resources,
- Local or state assistance agencies,
- Clergy/Chaplains

All of the above employees will maintain confidentiality except in extreme cases of immediate threat or danger, or abuse of a minor. On-site counselors (and/or the Employee Assistance Program) are available to help free of charge and can be seen on an emergency basis during normal business hours. These employees will submit yearly anonymous, aggregate, statistical information for Clery Act purposes unless they believe it would be harmful to a specific client, patient or parishioner.

SECURITY ACCESS TO THE RADIOLOGY PROGRAM

To increase security of the School, there is a badged entry for faculty and students only. There are two entrances leading to the class room and one entrance to the student's lab that have badged locks that remain locked at all times.

ONSITE SECURITY DEPARTMENT

Sovah Health – Danville, Sovah Health – Martinsville, and Morehead Memorial Hospital have an onsite Security Department. The onsite security department does not have the authority to carry weapons or make arrests. Contacting the local law enforcement is conducted immediately in the event of a crime being reported. As a member of the Program and hospital community, students and employees are encouraged to report any form of crime or violence to the CSA for your own security as well as the security of others.

There is no Security Department on campus of Sovah Health School of Health Professions. In the event of violence or crime that occurs on the School's premises, the local law enforcement must be contacted immediately.

ILLEGAL DRUG AND ALCOHOL POLICY AND IMPLEMENTATION PROGRAM

Illegal Drug and Alcohol Policy

School of Health Professions is firmly committed to maintaining an environment free of the influence of illegal drugs and alcohol. In keeping with this commitment, the School maintains the right to require any student to undergo testing to determine his or her fitness for enrollment in the School. Students will be dismissed from the School for any illegal or unauthorized involvement with drugs or alcohol. Illegal or unauthorized involvement includes, but is not limited to:

- a. Illegal or unauthorized possession, use, manufacture, dispensation, distribution, or purchase of illegal drugs and/or alcohol
- b. Being under the influence of drugs and/or alcohol

- c. Violation of any applicable federal or state criminal drug and/or alcohol statute
- d. Positive laboratory testing for drugs in which the student does not have a legal prescription, or which the student is using in a non-prescribed manner.

Illegal Drug and Alcohol Implementation Program

Drug Screen testing will be done at the following times:

- a. Upon enrollment
- b. Upon re-enrollment
- c. At randomly chosen time(s)
- d. Any Student "For Cause"

IF A STUDENT REFUSES OR FAILS TO BE TESTED AT THE REQUIRED OR "FOR CAUSE" TIMES AS REQUESTED, OR, IF A STUDENT ATTEMPTS TO TAMPER WITH ANY PART OF THE TESTING PROCESS, HE/SHE WILL BE DISMISSED FROM THE SCHOOL OF HEALTH PROFESSIONS.

Post-Accident Drug Test – Work related accidents involving students **MUST** be reported immediately to the Clinical Instructor and the Program Director. Students involved in a work related "accident" must not be allowed to leave the facility and **will be required** to undergo an immediate drug screening. Students involved in such accidents that leave without permission of a Faculty Member or Program Director will be disciplined and may be terminated from the program.

Upon report of an accident during clinical hours, the Program Director shall review the circumstances of the work related "accident" and will immediately schedule the student for a **mandatory** drug screening. Typically an "accident" is any event, incident, or judgment resulting in:

- a. **Bodily injury** (including a needle stick and a blood splash) to the student that requires medical attention other than simple First Aid/one time treatment for minor scrapes, scratches, cuts, burns, splinters, etc.
- b. **Bodily injury** of any kind to another person.
- c. **Death to any person.**
- d. **Damage to any property.**

Students who are required to undergo a post-accident drug screening, based on the above criteria, will be suspended from clinical rotations pending the results of such test. If the results are positive for an illegal substance the student will immediately be dismissed from the program. If the student tests positive for a prescribed drug in **excess** of the prescribed amount, the student may be disciplined, up to and including termination retroactive to the date of the accident. A refusal to undergo the test will be

grounds for dismissal. The test should be administered as soon as practical following the work related incident and prior to the student leaving the work location.

“For Cause” Testing

“For Cause Testing” provides the faculty with a means to identify drug and/or alcohol affected students who may pose a danger to themselves, others, or patients under their care, in the performance of their duties in the clinical area or affiliating agencies. In addition, the testing may be requested when the student is attending class/clinical or present on Campus or the properties of any clinical affiliate(s). The faculty and staff attended a training program presented by the Employee Assistance Program of Sovah Health – Danville on the signs and symptoms of substance abuse/chemical dependency.

- a. If a student exhibits behaviors indicative of the possibility of illegal or unauthorized involvement with drugs or alcohol, or a noticeable odor of drugs or alcohol on the student is noticed, the School will conduct the investigation deemed appropriate to determine whether corrective action is needed. The School maintains the discretion to take whatever corrective action deemed appropriate under the particular circumstances.
- b. Instructor(s) will maintain records of observations of student behaviors, which indicate the possibility of illegal or unauthorized involvement with drugs and alcohol. It may be appropriate to meet with the student and discuss the observations and consider various explanations for the behaviors.
- c. If a pattern of suspicious behavior develops (see **INDICATORS OF SUSPECTED CHEMICAL SUBSTANCE ABUSE in this handbook**), the student will be confronted with the suspicious behavior and requested to have drug testing at that time. In addition, if a student exhibits behaviors in the clinical or classroom setting indicative of the possibility of substance abuse, the student will be confronted with the behaviors and requested to have immediate testing for drug and alcohol abuse. The student will be counseled as to the seriousness of the observed behaviors and how these behaviors affect performance and patient care.
- d. **Drug and alcohol** testing will be required of a student if the School is notified internally or externally of the possibility of substance abuse. The student will be confronted with the allegation and requested to undergo immediate drug and/or alcohol testing.
- e. The student will not be permitted to return to clinical until the Program Director or designee receives the testing result.
- f. Any Applicant/Student who tests positive for an **illegal drug** or a legal drug which the student is using in a non-prescribed manner will be dismissed and will not be eligible for admission / re-admission to the School at any time.
- g. If a student is deemed to be under the influence during clinical or class, the faculty member(s) will request the student’s keys to prevent him/her from driving. The faculty in this case reserves the right

to contact the students' parents, guardian or significant other to request that the student be provided transportation home in order to prevent harm to the student or others. If a student refuses, the Program Director will notify local law enforcement of the time and location so that they may deal with this student officially.

h. It is our goal to protect the student and the general public from potential harm.

Conviction of any Drug Statute

A student who is convicted of violating any drug statute must notify the Program Director within 5 days of the conviction. Within 10 days of receiving this notice from the student or otherwise learning of the conviction, the School will give notice of the conviction to the federal agency involved in any applicable grant program.

After receiving such notice from a student or otherwise learning of such a conviction, the School will take the corrective action appropriate, up to and including dismissal.

Notification of Illegal Drug and Alcohol Policy and Implementation Program

At the beginning of this program, each student will be given a copy of this Illegal Drug and Alcohol Policy and Implementation Program. As this policy may be modified from time to time students will be provide with updates. The student will be required to sign the attached form acknowledging receipt of the copy, understanding of the program, understanding of the requirements of adherence, and understanding of the possibility of corrective action, up to and including dismissal from the School.

Drug-free Awareness Program

The School of Health Profession's Drug-Free Awareness Program includes the following elements:

- a. The School conducts ongoing education and training, including in-service programs, to inform and remind students and employees about the dangers of illegal and unauthorized involvement with drugs and alcohol.
- b. Among the topics that may be discussed and explained further in these education and training programs are the health risks associated with chemical substance abuse, social effects of chemical and substance abuse, and the applicable legal sanctions under local, state, and federal law for illegal involvement with drugs and alcohol.
- c. The School publicizes and discusses this Program on Illegal Drugs and Alcohol at least annually. Thus, students and employees are informed and reminded regularly of the School's policy, the expected standards of behavior, and the potential for corrective action for violations of the policy.
- d. The School makes efforts to inform and remind students about the availability of rehabilitation and counseling services.

References: (For more in-depth description)

Federal Register 34 CFR Part 86 (August 16, 1990). Washington, DC: U.S. Dept. of Education.

Wilson, H., & Kneisl, C. (1988). *Psychiatric nursing*. Menlo Park, California: Addison-Wesley.

U.S. Department of Justice, Drug Enforcement Administration. (1989). *Drugs of abuse*. U.S. Government Printing Office.

LEGAL SANCTIONS FOR ILLEGAL INVOLVEMENT WITH DRUGS AND ALCOHOL

There are a number of federal, state, and local laws controlling or prohibiting the possession and distribution of drugs and alcohol. Violations of these laws can lead to lengthy imprisonment, substantial fines, or both.

ALCOHOL

Virginia State laws concerning the purchase, possession, consumption, sale, and storage of alcoholic beverages include the following:

Any sale of alcoholic beverages requires an ABC license.

Alcoholic beverages are not to be given or sold to persons less than 21 years of age.

Alcoholic beverages are not to be given or sold to persons who are intoxicated.

State law prohibits; drinking in unlicensed public places; possession of alcoholic beverage by person under 21 years of age; falsely representing one's age for the purpose of procuring alcohol; and purchasing an alcoholic beverage for a person who is less than 21 years of age.

DRUGS

The Federal Controlled Substance Act and the Virginia Control Act penalizes for unlawful manufacturing, distribution, use and possession of controlled substances, including marijuana, cocaine, and LSD. The penalties vary based on the type of drug involved, possession, and intent to distribute. Federal law sets penalties for the first offense ranging from one year to life imprisonment and/or \$100,000 to \$4 million fines. Penalties may include forfeiture of properties, including vehicles used to transport or conceal controlled substance or denial of federal benefits such as student loans. Convictions under state law may be misdemeanor or felony crimes with sanctions from six months to life imprisonment and/or \$250 to \$100,000 fines.

Federal law holds that any person who: distributes, possesses with intent to distribute, or manufacture a controlled substance in, or within one thousand feet of an educational facility, is subject to a doubling of the applicable maximum fine and punishments. Virginia state law carries sanctions of up to five years of imprisonment and up to \$100,000 fine for similar violations.

INDICATORS OF SUSPECTED CHEMICAL SUBSTANCE ABUSE

APPEARANCE: Inattention to personal appearance and hygiene. Has an odor of alcohol on the breath

and a flushed appearance. Glassy red and/or watery eyes, frequent runny nose, tremors, unsteady gait. **Weight loss**, hyperactivity and hyper-vigilance or drowsiness.

SOCIAL CHANGES: Increased isolation, eat alone, avoids peers and has a decreased interest in school and other social activities.

GENERAL BEHAVIORS: Frequent inappropriate responses; elaborate excuses for behaviors; grandiosity; **decrease in grades**; late to class and leaves early; frequent trips to the bathroom during class and clinical times; lying and blames others for problems; increasing irritability; mood swings and erratic behavior. Involvement in an accident on School or any affiliates property resulting in an injury or significant damage to property.

MENTAL STATUS: Forgetfulness, memory loss, confusion, euphoria, disorientation, and has difficulty following directions and instructions. Makes repeated mistakes due to inattention and exercises poor judgment. Has difficulty remembering one's own mistakes.

ABSENTEEISM: Repeated absences and tardiness, particularly if they follow a pattern. Unbelievable excuses for absences. Frequently absent for respiratory problems and gastritis. Leaves class or the clinical area without permission.

ANY and ALL of the above indicators are grounds for "for cause" testing.

DRUG AND ALCOHOL TREATMENT

The School sincerely desires to offer assistance to any student who seeks help with a drug or alcohol abuse problem. Free resources for the Danville community are:

- Danville-Pittsylvania Community Services – (434) 799-0456
- Alcoholics Anonymous – (434) 799-4111
- Counseling and Psychological Services – (434) 792-2277

These services are not a shield from corrective action for students who violate the School's program on Illegal Drugs and Alcohol.

HEALTH RISKS RELATED TO THE USE OF ILLICIT DRUGS AND ABUSE OF ALCOHOL

The use of illicit drugs and the abuse of alcohol (chemical substance abuse) pose numerous health risks to individuals. Chemical substance abuse strikes all ages, cultural groups, and socioeconomic classes. Studies show that one out of every ten American workers is a substance abuser. Chemical substance abuse is a major public health issue. It affects the abuser physiologically and psychologically, as well as socially.

SOCIAL EFFECTS OF CHEMICAL SUBSTANCE ABUSE

Chemical substance abuse is a major issue with grave ramifications. It increases the crime rate, auto accident deaths, number of teenage pregnancies, and the suicide rate. The abuser and their family members are destroyed by chemical substance abuse. Substance abuse in the work setting increases accidents, workman's compensation claims, absenteeism, and theft.

Dating Violence, domestic violence, sexual assault, and stalking

Sovah Health School of Health Professions prohibits crimes of dating violence, domestic violence, sexual assault, and stalking. Incoming students and faculty are provided awareness on ways of prevention and reporting when it comes to dating violence, domestic violence, sexual assault, and stalking. Yearly campaigns or education Programs are conducted to help aid in sexual misconduct prevention.

- **Dating Violence:** Dating violence is violence, force, or threat that results in bodily injury or places one in reasonable apprehension of death, sexual assault, or bodily injury committed by a person who is or has been in a close relationship of a romantic or intimate nature with the other person. The existence of such a relationship shall be determined based on a consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- **Domestic Violence:** Domestic violence is violence, force, or threat that results in bodily injury or places one in reasonable apprehension of death, sexual assault, or bodily injury and that it committed by a person against such person's family or household member, which includes a current or former spouse a person with whom the victim shares a child in common, or who is cohabitating with or has cohabitated with the person as a spouse or intimate partner.
- **Sexual Assault:** Sexual assault is defined as the intentional sexual contact with a person against that person's will by the use of force, threat, or intimidation, or through the use of a person's mental incapacity or physical helplessness. Sexual assault includes intentionally touching, either directly or through clothing, of the victim's genitals, breasts, thighs, or buttocks without he person's consent, as well as forcing someone to touch or fondle another against his or her will. Sexual battery is a type of sexual assault.
- **Stalking:** Stalking occurs when someone, on more than one occasion, engages in conduct directed at another person with the intent to place, or knows or reasonably should know that the conduct places that other person reasonable fear of death, criminal sexual assault, or bodily injury to that other person or to that other person's family or household member.
- **Consent:** Any sexual activity or sex act committed against one's will, by the use of force, threat, intimidation, or ruse, or through one's mental incapacity or physical helplessness is without consent. Consent is knowing, voluntary, and clear permission by word or action, to engage in mutually-agreed upon sexual activity. Silence does not necessarily constitute consent. Past consent to sexual activities, or a current or previous dating relationship, does not imply ongoing or future consent. Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). An individual cannot consent who is under the age of legal consent. The existence of consent is based on the totality of the circumstances, including the context in which the alleged incident occurred.

Mental incapacity means that condition of a person existing at the time which prevents the person from understanding the nature or consequences of the sexual act involved (the who, what, when, where, why, and how) and about which the accused knew or should have known. This includes incapacitation through the use of drugs or alcohol. Intoxication is not the same as incapacitation.

Physical helplessness means unconsciousness or any other condition existing at the time which otherwise rendered the person physically unable to communicate an unwillingness to act and about which the accused knew or should have known. Physical helplessness may be reached through the use of alcohol or drugs.

Any form of the above mentioned sexual misconduct is encouraged to be reported by any witnesses or bystanders.

Anyone that feels they have been a victim of sexual and domestic violence, dating violence, or stalking should contact law enforcement authorities. If a student or employee wishes to contact the Title IX Coordinator or one of the faculty members to report the incident, assistance will be provided to the victim to contact local law enforcement if the victim wishes to do so. Victims are given a written notification which includes:

- The importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order
- How and to whom the alleged offense should be reported
- Where applicable, the rights of victims and the institution's responsibilities for orders of protection, "no-contact" orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court or by the institution.

If a victim does not wish for their name to be shared, does not wish for an investigation to take place, or does not want a formal resolution to be pursued, the victim may make such a request. The request will be evaluated in light of the duty to ensure the safety of the campus and comply with federal law. In cases indicating pattern, predation, threat, weapons and/or violence, the School will likely be unable to honor a request for confidentiality. In cases where the victim requests confidentiality and the circumstances allow the School to honor that request, the School will offer interim supports and remedies to the victim and the community, but will not otherwise pursue formal action. A reporting party has the right, and can expect, to have reports taken seriously by the School when formally reported, and to have those incidents investigated and properly resolved through these procedures. Confidential reporting is available to appointed on-site confidential employees. Reports to confidential employees as well as any other reports are disclosed statically for Clery Act reporting purposes. No identifiable information will be released.

A written notification is provided to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, student financial aid, and other services available for victims, both within the institution and in the community. Included in this notification are options for, available assistance in, and how to request changes to academic, parking, and/or protective measures.

Preliminary Inquiry

Following receipt of notice or a report of misconduct, the Title IX Coordinator engages in a preliminary inquiry to determine if there is reasonable cause to believe the nondiscrimination policy has been violated. The preliminary inquiry is typically 1-3 days in duration. The inquiry may also serve to help the Title IX Coordinator to determine if the allegations evidence violence, threat, pattern, predation, and/or weapon, in the event that the reporting party has asked for no action to be taken. In any case where violence, threat, pattern, predation, and/or weapon is not evidenced, the Title IX Coordinator may respect a reporting party's request for no action, and will investigate only so far as necessary to determine appropriate remedies. As necessary, Sovah Health SOHP reserves the right to initiate resolution proceedings without a formal report or participation by the reporting party.

In cases where the reporting party wishes to proceed or the School determines it must proceed, and the preliminary inquiry shows that reasonable cause exists, the Title IX Coordinator will direct a formal investigation to commence and the allegation will be resolved through one of the processes discussed briefly here and in greater detail below:

- Conflict Resolution-typically used for less serious offenses and only when both parties agree
- Formal Resolution-resolution by a trained administrator

The process followed considers the preference of the parties, but is ultimately determined at the discretion of the Title IX Coordinator. Conflict Resolution may only occur if selected by all parties, otherwise the Formal Resolution Process applies.

If conflict resolution is desired by the reporting party, and appears appropriate given the nature of the alleged behavior, then the report does not proceed to investigation, unless a pattern of misconduct is suspected or there is an actual or perceived threat of further harm to the community or any of its members.

Once a formal investigation is commenced, the Title IX Coordinator will provide written notification of the investigation to the responding party at an appropriate time during the investigation. Notification will be made in writing and may be delivered by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in office School records, or emailed to the parties' email account. Once mailed, emailed and/or received in-person, notice will be presumptively delivered. The reporting party is typically copied on such correspondence. The School aims to complete all investigations within a sixty calendar day period, which can be extended as necessary for appropriate cause by the Title IX Coordinator with notice to the parties as appropriate.

If, during the preliminary inquiry or at any point during the formal investigation, the Title IX Coordinator determines that there is no reasonable cause to believe that policy has been violated, the process will end unless the reporting party requests that the Title IX Coordinator makes an extraordinary determination to re-open the investigation. This decision lies in the sole discretion of the Title IX Coordinator.

Investigation

Once the decision is made to commence a formal investigation, the Title IX Coordinator will conduct the investigation within two days of determining that an investigation should proceed. Investigations are completed within ten days, though some investigations take weeks or even months, depending on the nature, extent and complexity of the allegations, availability of witnesses, police involvement, etc.

The School may undertake a short delay in the investigation process when criminal charges on the basis of the same behaviors that invoke this process are being investigated. The School will promptly resume its investigation and resolution process once notified by law enforcement that the initial evidence collection process is complete. The School action will not typically be altered or precluded on the grounds that civil or criminal charges involving the same incident have been filed or that charges have been dismissed or reduced. The complainant has the right to proceed with a criminal investigation and a Title IX complaint simultaneously.

All investigations will be thorough, reliable, impartial, prompt, and fair. Investigations entail interviews with all relevant parties and witnesses, obtaining available evidence and identifying sources of expert information, as necessary.

These are the steps of a formal investigation (not necessarily in this order):

- Initiate any necessary remedial actions;
- Determine the identity and contact information of the reporting party;
- Conduct an immediate preliminary inquiry to determine if there is reasonable cause to believe the responding party has violated policy.
 - If there is insufficient evidence to support reasonable cause, the inquiry should be closed with no further action;
- Identify all policies allegedly violated;
- Commence a thorough, reliable and impartial investigation by developing a strategic investigation plan, including a witness list, evidence list, intended timeframe, and order of interviews for all witnesses and the responding party, who may be given notice prior to or at the time of the interview;
- Prepare the notice of allegation on the basis of the preliminary inquiry;
- Meet with the reporting party to finalize their statement, if necessary;
- Provide written notification to the parties prior to their interviews that they may have an advisor of their choosing present for all meetings attended by the advisee;
- Provide reporting party and responding party with a written description of the alleged violation(s), a list of all policies allegedly violated, a description of the applicable procedures and a statement of the potential sanctions/responsive actions that could result;
- Prior to the conclusion of the investigation, provide the reporting party and the responding party with a list of witnesses whose information will be used to render a finding;

- Allow each party the opportunity to suggest questions they wish the investigator to ask of the other party and witnesses;
- Provide parties with all relevant evidence to be used in rendering a determination and provide each with a full and fair opportunity to address that evidence prior to a finding being rendered;
- Complete the investigation promptly, and without reasonable deviation from the intended timeline;
- Provide regular updates to the reporting party throughout the investigation, and to the responding party, as appropriate;
- The Title IX Coordinator will determine a finding, based on a preponderance of the evidence, and present it to a review committee;
- The review committee, which will consist of the Title IX Coordinator and the panel, will review the findings of the investigation and support or reject them;
- The Title IX Coordinator will finalize and present the findings to the parties; without undue delay between notifications.

At any point during the investigation, if it is determined there is no reasonable cause to believe that the Sovah Health SOHP policy has been violated, the Title IX Coordinator has authority to terminate the investigation and end resolution proceedings.

Witnesses (as distinguished from the parties) are expected to cooperate with and participate in the School's investigation and the Resolution Process. Failure of a witness to cooperate with and/or participate in the investigation or Equity Resolution Process constitutes a violation of policy and may be subject to discipline. Witnesses may provide written statements in lieu of interviews during the investigation and may be interviewed remotely by phone or similar technology if they cannot be interviewed in person or if the investigators determine that timeliness or efficiency dictate a need for remote interviewing.

No unauthorized audio or video recording of any kind is permitted during investigation meetings or other Equity Resolution Process proceedings.

Advisors

All parties are entitled to an advisor of their choosing to guide and accompany them throughout the School resolution process. The advisor may be a friend, mentor, family member, attorney, or any other supporter a party chooses to advise them. Witnesses cannot also serve as advisors. The parties may choose advisors from inside or outside the campus community. The parties may be accompanied by their advisor in all meetings and interviews as which the party is entitled to be present, including intake and interviews. Advisors should help their advisees prepare for each meeting, and are expected to advise ethically, with integrity and in good faith. The School cannot guarantee equal advisory rights, meaning that if one party selects an advisor who is an attorney, but the other party does not, or cannot afford an attorney, the School is not obligated to provide one.

All advisors are subject to the same campus rules, whether they are attorneys or not. Advisors may not address campus officials in a meeting or interview unless invited to. The advisor may not make a presentation or represent the reporting party or their responding party during any meeting or proceeding and may not speak on behalf of the advisee to the investigator or the review committee. The parties are expected to ask and respond to questions on their own behalf, without representation by their advisor.

Formal Resolution

Formal Resolution can be pursued for any behavior that falls within the policy on Sex/Gender Harassment, Discrimination, and Misconduct, at any time during the process.

In a Formal Resolution, the Title IX Coordinator has the authority to address all collateral misconduct, meaning that they hear all allegations of discrimination, harassment and retaliation, but also may address any additional alleged policy violations that have occurred in concert with the discrimination, harassment or retaliation, even though those collateral allegations may not specifically fall within the policy Sex/Gender Harassment, Discrimination, and Misconduct. Accordingly, investigations should be conducted with as wide a scope as necessary.

Any evidence that the Title IX Coordinator believes is relevant and credible may be considered, including history and pattern evidence. The Title IX Coordinator may exclude irrelevant or immaterial evidence and may choose to disregard evidence lacking in credibility or that is improperly prejudicial.

Unless the Title IX Coordinator determines it is appropriate, the investigation and the finding will not consider: (1) incidents not directly related to the possible violation, unless they show a pattern, (2) the sexual history of the reporting party (though there may be a limited exception made in regards to the sexual history between the parties), (3) or the character of the reporting party. While previous conduct violations by the responding party are not generally admissible as information about the present allegation, Title IX Coordinator/investigator will consider the previous good faith allegations and/or findings to consider as evidence of pattern and/or predatory conduct.

The Title IX Coordinator/investigator will not meet with character witnesses, but will accept up to two letters supporting the character of each of the parties.

The Title IX Coordinator will base the determination(s) on the preponderance of the evidence, whether it is more likely than not that the responding party violated policy as alleged.

The responding party may choose to admit responsibility for all or part of the alleged policy violations at any point during the investigation. If the responding party admits responsibility, the Title IX Coordinator will render a determination that the individual is in violation of the School's policy.

If the responding party admits the violation, or is found in violation, the Title IX Coordinator will determine an appropriate sanction or responsive action, will implement it, and act promptly and effectively to stop

the harassment or discrimination, prevent its recurrence and remedy the effects of the discriminatory conduct.

The Title IX Coordinator will inform the parties of the final determination within three days of the resolution, without significant time delay between notifications. Notification will be made in writing and may be delivered by one or more of the following methods: in person; mailed to the local or permanent address of the parties as indicated in official School records; or emailed to the parties as indicated in official School records. Once mailed, emailed and/or received in-person, notice will be presumptively delivered. The notification of outcome will specify the finding on each alleged policy violation, any sanctions that may result which the School is permitted to share according to state or federal law, and the rationale supporting the essential findings to the extent the School is permitted to share under state or federal law. The notice will also include information on when the results are considered by the School to be final, any changes that occur prior to finalization.

SANCTIONS

Sovah Health School of Health Professions will take the appropriate steps to prevent the recurrence of any violations of this policy and correct any discriminatory effects. Sanctions for a respondent who violated any part of this policy are based on the nature and severity of the misconduct, any record of prior discipline for a similar violation, or both. Any sanctions against the faculty will be addressed appropriately with Sovah Health's Human Resources Department.

If the respondent poses a threat to the complainant or on the premises, sanctions may be applied before the investigation/appeals process is complete.

The following sanctions may be imposed upon any member of the community found to have violated the Sex/Gender Harassment, Discrimination and Misconduct Policy. The following are the typical sanctions that may be imposed upon students or employees singly or in combination:

Student Sanctions

- Warning
- Probation
- A No-Contact Order
- Suspension
- Suspension Pending Investigation
- Expulsion
- Withholding Degree
- Revocation of Degree
- Transcript Notation
- Other Actions

Employee Sanctions (listed below and defined in Sovah Health’s Corrective Counseling/Discipline & Behavioral Accountability Policy)

- Verbal Counseling
- Written Counseling
- Suspension
- Suspension Pending Investigation
- Termination

The decision-making body reserves the right to broaden or lessen any range of recommended sanctions in the case of serious mitigating circumstances or egregiously offensive behavior. Neither the initial hearing officers nor any appeals body or officer will deviate from the range of recommended sanctions unless compelling justification exists to do so.

Interim Remedies and Long-term Remedies

During an investigation, interim remedies may need to be put in place to protect the complainant depending on the nature of the sexual misconduct. These interim steps will be taken promptly, and at no cost to the complainant. Sovah Health SOHP will continue to take these steps if sexual violence is found to have occurred. These remedies may include, but are not limited:

- retaking a test
- making up a late assignment
- a no-contact order
- a change to parking status
- increased security while in the building or walking in the parking lot, and/or
- filing a leave of absence following the Program’s policy.

Registered Sex Offenders

Upon enrollment to Sovah Health SOHP a criminal background check is performed on all students. To locate registered sex offenders in Danville, Virginia go to <http://sex-offender.vsp.virginia.gov/sor/>.

CAMPUS SAFETY and SECURITY

Safety regulations apply to Sovah Health School of Health Professions students and faculty. Safety should never be taken for granted. To ensure a safe working environment, each student should be aware of the policies and procedures of the School as well as the policies and procedures of the clinical site they are assigned. In addition, each student must be familiar with his/her personal safety responsibilities. Students should notify a School faculty/staff member or Security staff of any hospital of any potentially hazardous or unsafe condition as soon as possible.

Each student or employee of the School who is a victim of a crime or witnesses a crime against another person or their property is required to report such to the Medical Center Security of the hospital the student is assigned. If violence or crime occurs while on the School’s campus, the local law enforcement

must be contacted immediately. Sovah Health School of Health Professions does not currently have security on site at the River District Building. Each student or employee who is a victim of a crime is expected to cooperate with the local police during the investigation and prosecution of any crime committed on the campus. More detailed information is in the Student Handbook.

Students participate annually in the required Medical Center's (RE-ED) safety Program, which consist of but not limited to: fire plan, back safety, infection control, hazardous materials and chemical spills, electrical safety, workplace violence/keeping the environment safe, body mechanics, radiation safety, and substance abuse.

CAMPUS SECURITY ACT

On-campus crimes must be reported annually by the School and each student and employee is entitled to see this report (See Above). The School cannot prevent criminals from committing a crime on Hospital/School property. Security patrols that are random and staggered are used in hopes that such patrols will deter criminal activity while on hospital premises. A security system requiring use of an ID badge for access to the School is also utilized. However, there is no guarantee that there will be no criminal activity on hospital/School property. Annually, the School will offer programs on the following topics:

- Crime Prevention
- Campus Security procedures and practices
- Chemical substance abuse

IMMEDIATE EMERGENCY RESPONSE

Victims of sexual misconduct or any other incidents should also be aware that Program Director must issue immediate timely warnings for incidents reported to them that are confirmed to pose a substantial threat of bodily harm or danger to members of the School community. The School will ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger.

HOSTILE PERSON

PURPOSE: To ensure all students/faculty/staff are in a safe environment and to communicate expectations of actions to be taken in the event of an observed/perceived hostile person on the River District Tower Property, within the School of Health Professions space, or any public space in the immediate vicinity.

Err on the side of safety – a false alarm is far better than no alarm when needed!

ACTIONS: When it becomes known that any person is considered hostile, creating a dangerous environment which threatens bodily injury or death of other persons, the following action plan will be enacted immediately: **(Anyone knowledgeable of the hostile person/dangerous environment should activate the plan.)**

- 1. If the Hostile Person is identified within or on the property of the River District Tower Facility, its parking areas or adjacent public spaces:**

- a. Seek a safe environment out of sight of the intruder as quickly as possible.
 - b. **Dial 9-911 on Sovah Health – Danville phone or direct dial 911 using a cell phone for the Danville Police Department. (This should be your FIRST call for all emergencies!) Provide the following information:**
 - i. Your name and location. **River District Tower, 109 Bridge Street, Suite 200**
 - ii. The situation and location of situation taking place, such as *“an armed person in the director’s office of Radiologic Technology Program on second floor of Suite 200”* If room number is known, report it.
 - iii. A description of the violent person(s) involved (physical description, clothing, vehicle information) and the individual’s exact location or direction of travel.
 - iv. Any injuries and the location of injured person(s).
 - v. If weapons or specific contraband is known, report it.
 - vi. Stay near the phone or use cell phone and give police that number in order to establish a contact number for further communications.
 - c. **Contact the Radiologic Technology Program Director, if not present.**
 - d. If inside, remain inside lock-down areas until word has been given that all is clear or an order to evacuate the premises is given by a **law enforcement officer or program official**.
 - e. Stay away from all entry doors and remain out of sight of these doors.
 - f. **Upon direction of the Danville City Police or administrator on site, quietly** evacuate all persons to a distant area if movement is safe.
 - g. Persons in classrooms, offices, or other sections of the building **will not** approach the hostile person and will stay in their current location. If in the hallway, seek shelter in the nearest office or classroom. Lock the door if possible or block the entrance; close all windows and blinds; turn off all lights; crouch down in an area that is out of sight from the doors and windows; remain quiet; stay put until an all-clear notice is given by the **law enforcement officer or program official in charge**. Maintain communication with officials until the crisis has ended.
 - h. No other person will be allowed to enter the hostile area or its surroundings other than to provide medical attention.
 - i. Once the Danville police arrive on the scene, they have legal responsibility and final authority.
 - j. An alert notification will be sent to stay clear of the building for anyone not on campus.
2. Once the situation is under control, **ONLY** the **Danville City Police** will give the all-clear and appropriate parties will be informed. The Director of the Program will make the decision regarding class/clinical activities for the remainder of the day.
 3. **In the event of a hostile person while on clinical property, follow the lead of the technologist you are working with and abide by the policies of the specific clinical facility.**

FIRE/EVACUATION PROCEDURE

If the order is given to evacuate the SOHP facility, it will be given with the designation EAST or WEST in order to direct you to the proper exit and all personnel will **muster in the park at the fountain immediately upon leaving the building**. As soon as all persons are accounted for, further instructions will be given by the faculty member in charge.

- **East** will be the MAIN entrance and personnel should move quickly, without running, to the east stairwell near the elevators and exit to the street level. If in the classroom, proceed through the breakroom and toward the main entrance stairwell.

- **West** will be the exit next to the lab. Personnel should move quickly, without running, to the west stairwell near the lab and exit on the street level.

2017 Campus Security Report

(These numbers are from our previous location: Sovah Health – Danville Medical Center)

	9/1/13 – 8/31/14	9/1/14 – 8/31/15	9/1/15 – 8/31/16
Criminal Homicide			
Murder and Non-negligent manslaughter	0	0	0
b. Negligent manslaughter	0	0	0
Sex Offenses:			
a. Forcible	0	0	0
b. Non-forcible	0	0	0
Robbery	1	0	0
Aggravated assault	1	0	0
Burglary	1	0	0
Motor vehicle theft	0	0	1
Arson	0	0	0
Hate Crimes			
a. Larceny-theft	0	0	0
b. Simple assault	0	2	0
c. Intimidation	0	1	0
d. Destruction, damage, or vandalism of property	0	0	0
Copyright Infringement	0	0	0
Drug/alcohol violations	4	0	0
Weapons Violations	2	0	0
Arrests (non-civil citations)	0	0	0
*Domestic Violence	4	1	0
*Dating Violence	0	0	0
*Stalking	0	0	0