

VERVE COLLEGE

Annual Security Report

Oak Brook & Chicago

2025

Oak Brook Campus – 2625 Butterfield Rd. ST 102 E Oak Brook, IL 60523 Phone: 630-705- 9999
Chicago Campus – 216 W. Jackson Blvd., ST 900 Chicago, IL 60606 Phone: 312-920- 8822

Table of Contents

About the Annual Security Report.....	3
Oak Brook and Chicago Police Departments.....	3
How to Report a Crime or Emergency	4
Confidential Reporting	4
Timely Warning and Emergency Notification Policy.....	5
Emergency Evacuation Procedures and Policies	7
Facility Access	9
Sexual Violence Policy Statement	9
Procedures for Victims of Dating Violence, Domestic Violence, Sexual Assault or Stalking	9
Possible Sanctions.....	10
Preserving Evidence for Victims of Violence or Sexual Assault	10
Preserving Evidence for Victims of Stalking.....	10
Counseling and Victim Support.....	11
Person of Contact in Case of Sexual Harassment or Sexual Assault	11
Sexual Assault Victim Bill of Rights	12
Sexual Harassment.....	12
Sexual Violence Prevention and Education Programs	12
Crime Prevention and Safety	14
Risk Reduction.....	15
Bystander Intervention Information.....	16
Alcohol And Drug Abuse Polices	17
Drug Alcohol Abuse Prevention Program (DAAPP).....	18
Registered Sex Offenders.....	25
Definitions	25
Crime Statistics	28
Report Distribution	29
Crime Statistics (Oak Brook)	30
Crime Statistics (Chicago).....	32
Verve College Policy for Prohibition of Discrimination, Harassment, and Retaliation.....	34
Responsibility	39

About the Annual Security Report

The Annual Security Report (“ASR”) is published each year in compliance with The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”), a federal statute codified at 20 U.S.C. Section 1092 (f), and updated in 2013. The law is named for Jeanne Clery, a 19 year-old Lehigh University freshman who was sexually assaulted and murdered in her campus residence hall in 1986. The Clery Act, signed in 1990, was originally known as the Crime Awareness and Campus Security Act. For more information on the Clery Act, please visit Clery Center for Security on-campus at www.clerycenter.org.

Compliance with these provisions does not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C. 1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA). The Higher Education Opportunity Act of 2008 and its accompanying regulations amend the Higher Education Act and specify new campus safety reporting requirements in the area of fire safety and fire statistics for on-campus housing. VERVE COLLEGE does not provide on-campus housing and does not have non-campus buildings nor does have dormitories.

VERVE COLLEGE has two campuses: one in Oak Brook, Illinois, and one in Chicago, Illinois. This report is a combined report for both campuses. Both locations comply independently with all the provisions of the Clery Act under the Higher Education Act (HEA).

The statistical years are calendar years (January – December) with statistics due in October for the previous calendar year. This ASR covers statistics for year 2022-2024.

The 2020 ASR includes crime statistics reported to VERVE COLLEGE on both campuses by the Oak Brook Police Department, Chicago Police Department, and designated Campus Security Authorities, including but not limited to deans, Campus Manager, and the Director of Financial Aid.

VERVE COLLEGE policies concerning safety, security, fire, sexual offenses, and alcohol/drug use are also found in the 2025 ASR.

Questions about the 2025 ASR may be referred to the Campus Manager, at inquiry@vervecollege.edu, 630.705.9999.

Oak Brook and Chicago Police Departments

The Oak Brook and Chicago Police Departments stand ready to assist anyone on VERVE COLLEGE campuses. VERVE COLLEGE will make immediate contact with the respective police department in any emergency or matter of crime reporting and crime investigation.

VERVE COLLEGE does not have any security personnel or campus police at either the Oak Brook or Chicago location.

How to Report a Crime or Emergency

VERVE COLLEGE Healthcare makes every effort to provide a safe, crime-free campus for our students. However, in the event a crime does occur, the students should do the following:

Dial 9-1-1 for any POLICE, FIRE, or MEDICAL EMERGENCY

Call quickly! Do not assume someone else has made the call. Try to provide the dispatcher with accurate, detailed information. Stay on the phone until the dispatcher tells you it is okay to hang up.

Call VERVE COLLEGE Administration

Any individual on the VERVE COLLEGE campus who is a victim of, or who observes, any criminal activity, should contact Administration. This will aid in providing timely warning notices to the campus and/or community, when appropriate. Reporting crimes will ensure inclusion in annual crime statistics. Suspicious or inappropriate activities, conduct which is questionable for criminal activity, or non-emergency safety concerns occurring on-campus, should also be reported to Administration.

Safety Tip: Students and employees are strongly urged to program into their mobile phones the direct telephone number for VERVE COLLEGE.

Tell a Campus Security Authority

Crimes or suspicious or inappropriate activities may also be reported to Campus Security Authorities, including the following:

Oak Brook Campus:
Ash Bindra
Student Services Manager
630-705-9999
ash@vervecollege.edu

Chicago Campus:
Miriam Escalante
Admission Advisor
312-920-8822
miriam@vervecollege.edu

The primary reason VERVE COLLEGE encourages the reporting of all crimes is to protect the whole person – body, mind, and spirit – of its students, employees, and visitors. Any person who feels unsafe or threatened should be assured of the school's commitment to provide the actions, assistance, support, and resources needed to ensure their safety and wellbeing.

Confidential Reporting

VERVE COLLEGE encourages anyone who is the victim of a crime or witness to a crime to report the incident. Without these reports, crime trends and problem areas on-campus cannot be identified. A victim of a crime within VERVE COLLEGE's jurisdiction who does not want to pursue action within the criminal justice system or under the school's investigative procedures is still encouraged to report the incident confidentially to Security or to a Campus Security Authority, making it clear they desire the report to be kept confidential. This allows the crime to be included in the annual statistics.

Police reports are public records under state law; thus, Oak Brook and Chicago Police Departments cannot hold reports of crime in confidence.

Timely Warning and Emergency Notification Policy

VERVE COLLEGE has established a standardized timely warning and emergency notification policy applicable to all campuses for the respective crimes or health concerns at each VERVE COLLEGE campus.

Timely warnings are provided to heighten safety awareness by giving students, and employees notification of crimes or life-threatening health concerns that occur on campus property, non-campus property, or on public property immediately adjacent to and accessible from campus and are considered by each respective campus to present a serious or continuing threat to students and employees.

In the event that a situation arises that in the judgment of the CSA, constitutes an ongoing or continuing threat to VERVE COLLEGE students or employees, a campus-wide “timely warning” bulletin will be issued by the CSA. The timely warning may be issued through any means deemed appropriate, including direct email notification, text messages, and/or telephonic communication.

In the event that an imminent threat to the health and safety of students or employees on a VERVE COLLEGE campus arises, the CSA will issue a campus wide “emergency notification” bulletin. The emergency will be confirmed through any means deemed appropriate including, but not limited to, communications with local law enforcement and safety agencies, witness accounts, news reports, the local Center for Disease Control (“CDC”) and other informative media that are deemed valid and reliable.

The timely warning and emergency notice bulletins will include the following information:

- School location;
- Date and time the bulletin was released;
- Approximate date and time the crime or health concern occurred;
- A summary statement of the incident;
- Physical description of the suspect related to a safety concern, if available;
- Overview of the symptoms if a health concern;
- Other relevant and important information about the crime(s) or health concern;
- Information on crime prevention, personal safety or other community safety and health related resources; and
- Actions taken by VERVE COLLEGE in response to the crime(s) or health concern.

The CSA will determine the content of the timely warning or emergency notice bulletin. To the extent possible, the bulletin will contain information in accordance with the standardized timely warning bulletin template provided below. The bulletin will be reviewed and approved by administration prior to distribution of the notification and to ensure the notification is timely, accurate, and credible.

A template of a timely warning and emergency notice bulletin for safety concerns follows:

“In compliance with the (“timely warning”/ “emergency notification”) provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, – (school Location) is issuing notice on(date/time).

REPORTED OFFENSE: At approximately (time) on (date), (type of crime) was committed at – VERVE COLLEGE (school Location).

SUSPECT: (There is no known suspect at this time.). OR (The suspect is (gender), approximately (height) and weighs (weight), with (hair color), wearing (_____.)

This incident involved _____ (Summary Statement of the incident).

REPORT SUSPICIOUS ACTIVITY: Everyone is urged to use caution when encountering individuals who are not personally known to them and to stay aware of their surroundings at all times. Please report any suspicious activity or suspicious persons to a Campus Security Authority or the local law enforcement.

If you have any information that might be helpful in this investigation, contact a Campus Security Authority. Please encourage anyone with information to assist us in keeping the school safe.

If anything suspicious occurs or you are the victim of a crime, immediately contact the local law enforcement by dialing 9-1-1.”

VERVE COLLEGE has contacted the local law enforcement and is currently working with them.

A template of a “timely warning” bulletin for health concerns follows:

“In compliance with the “timely warning” provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, VERVE COLLEGE–(school Location) is issuing notice on (date/time).

REPORTED HEALTH CONCERN: At approximately (time) on (date), (type of health concern) was reported at – (school Location).

The health concern description _____ (Summary Statement of the incident),

If you are experiencing any symptoms associated with this health concern, please report them to the CSA and contact your medical physician immediately.

VERVE COLLEGE will notify the campus community upon confirmation of an emergency or dangerous situation. Confirmation means officials have verified a legitimate emergency or dangerous situation exists, regardless of whether the pertinent details are known or are even available. Anyone with information warranting a timely warning should report the circumstances to administration.

VERVE COLLEGE will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

VERVE COLLEGE will provide adequate follow-up information to the community as needed

Emergency Evacuation Procedures and Policies

If you discover a fire or fire hazard, notify VERVE COLLEGE personnel immediately. Fire alarms are located throughout each campus building and can be activated in the event of a fire. Designated exit routes are posted on maps located in the hallways. Classes and school operations will resume following the all-clear signal.

In the event that an imminent threat to the health and safety of students or employees on a VERVE COLLEGE campus arises, the CSA will issue a campus wide “emergency notification” bulletin. The emergency will be confirmed through any means deemed appropriate including, but not limited to, communications with local law enforcement and safety agencies, witness accounts, news reports, the local Center for Disease Control (“CDC”) and other informative media that are deemed valid and reliable.

VERVE COLLEGE will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

In case of a fire and/or other emergency, students, prospective students, employees, and prospective employees must follow the directions of VERVE COLLEGE officials. All exits are clearly marked and students, prospective students, employees, and prospective employees are expected to leave the building in a prompt and orderly fashion using designated exits.

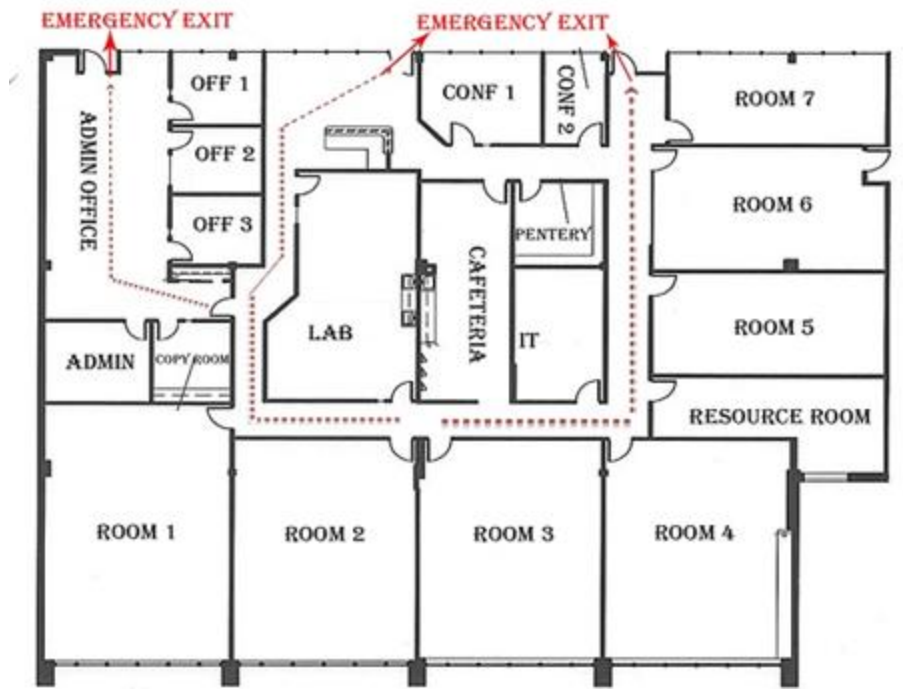
VERVE COLLEGE is responsible for developing, maintaining, and testing the Emergency Operations Plan on an annual basis. Emergency response and evacuation drills, both announced and unannounced, are conducted biannually. During drills/emergencies, monitors will be responsible to make sure everyone evacuates from their area or goes to a safe place in the building and does not reenter the facilities or leave the safe area until an “all clear” has been announced. No one is asked to take any risks to their wellbeing. Monitors fill out drill evaluation forms and return them to administration. Records of drills and testing are available for review upon request at the administrative office.

Bi-Annual Drills for Oak Brook and Chicago	
Drill 1	Drill 2
April	August

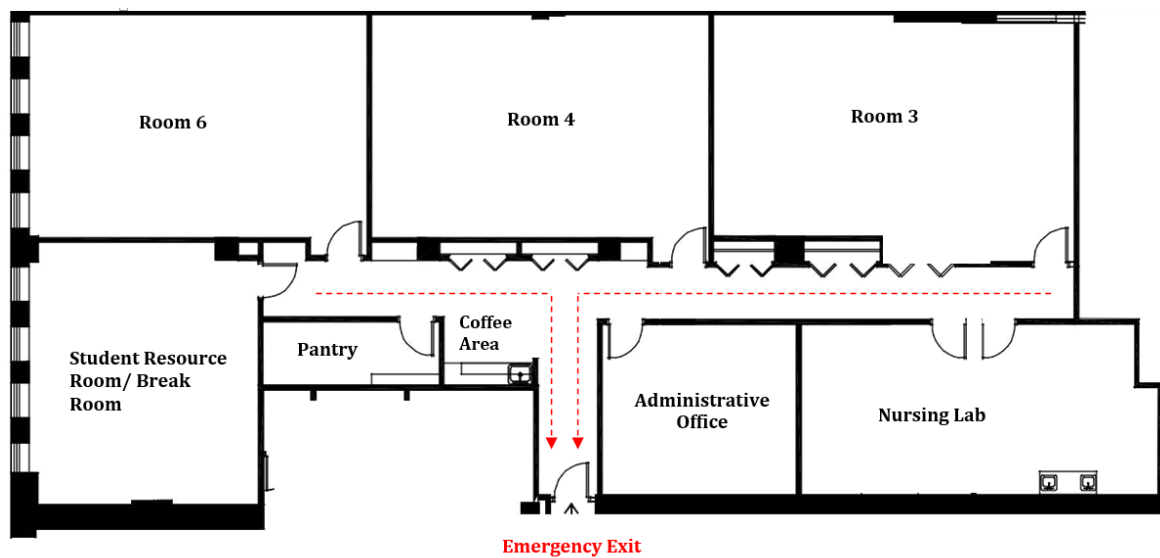
In the event of an emergency at the Oak Brook or Chicago campus, announcements are made notifying of the emergency, what immediate action should be taken and where to find additional information.

VERVE COLLEGE conducts regular response and evacuation drills for various emergencies to test the efficiency and effectiveness of response procedures. Directly following the drills, emails are sent to students and employees revisiting proper protocol for emergency situations.

Oak Brook Emergency Floor Plan



Chicago Emergency Floor Plan



Facilities Access

VERVE COLLEGE is a private campus and, as such, the grounds, administrative office, and academic classrooms are open and accessible to the public only during regular business hours and at times when an event may be scheduled by after hours. Only authorized personnel are allowed to enter the campus after hours. Administrative and academic rooms are generally secured when not in use.

VERVE COLLEGE does not have any campus residences at the Oak Brook or Chicago locations.

Sexual Violence Policy Statement

VERVE COLLEGE is committed to preventing sexual violence in all forms, including dating violence, domestic violence, sexual assault, and stalking, and will take appropriate remedial action against any individual found responsible for acts in violation of this policy. Acts of sexual violence may also constitute violations of criminal or civil law, or VERVE COLLEGE policies requiring separate proceedings.

Procedures for Victims of Dating Violence, Domestic Violence, Sexual Assault, or Stalking

Victims of sexual offenses should first get to a place of safety and then obtain necessary medical treatment. Any VERVE COLLEGE employee or student who has experienced a sexual offense is strongly encouraged to seek assistance immediately by dialing 911 from any telephone.

In Oak Brook, help may also be obtained by dialing 630.705.9999. Student or Employee victims may contact the Campus Manager for assistance in contacting local authorities and in seeking counseling.

In Chicago, help may also be obtained by dialing 312.920.8822. Student or Employee victims may contact the Campus Manager for assistance in contacting local authorities and in seeking counseling.

Following an allegation of domestic violence, dating violence, sexual assault, or stalking, VERVE COLLEGE may provide course or work adjustments, and/or no contact orders. Temporary suspension of the alleged perpetrator will be considered. VERVE COLLEGE does not issue orders of protection.

Complaints of dating violence, domestic violence, sexual assault, or stalking may be made to the following persons:

Oak Brook Campus:

Ash Bindra
Student Services Manager
630-705-9999
ash@vervecollege.edu

Chicago Campus:

Miriam Escalante
Admission Advisor
312-920-8822
miriam@vervecollege.edu

Following a complaint, an investigation and/or disciplinary proceedings will take place in accordance with VERVE COLLEGE Policy for Prohibition of Discrimination, Harassment, and Retaliation. Please refer to the Policy in this ASR for steps, anticipated timelines, and decision-making processes on page 34.

When VERVE COLLEGE investigation determines a violation of its policies has occurred, sanctions for employees may include a disciplinary warning to be added to the employee's permanent file, probation, suspension, and/or dismissal. Sanctions for students may include reprimand, a disciplinary warning to be added to the student's permanent file, probation, suspension, and/or dismissal.

If a Respondent is found to have violated this Policy, VERVE COLLEGE will initiate the appropriate sanctioning process to eliminate the misconduct, prevent its recurrence, and deter individuals from similar future behavior.

Possible Sanctions

- Reprimand: A written reprimand, including the possibility of more severe disciplinary sanctions in the event of the finding of a subsequent violation of VERVE COLLEGE regulations within a stated period of time.
- Campus Restrictions: Limitations on the times and/or places where a Respondent may be present on-Campus
- Educational Programs: Participation in educational programs, such as training, workshops, seminars, or other educational activities
- Revocation of VERVE COLLEGE Privileges: Revocation of VERVE COLLEGE privileges, such as participation in extra-curricular activities, for a definite or indefinite period of time
- Disciplinary Probation: Subjection to a period of critical examination and evaluation of behavior.
- No Contact Orders: Prohibition on all forms of contact with certain people.
- Suspension: Exclusion from classes and other privileges or activities as set forth for a definite period of time
- Dismissal: Permanent termination of student status

Preserving Evidence for Victims of Violence or Sexual Assault

VERVE COLLEGE strongly advocates victims of violence or sexual assault report the incident in a timely manner. Physical evidence is crucial in helping to prosecute assailants. Physical evidence must be collected in a timely manner by a certified medical facility. It is best practice to preserve evidence by not showering, bathing, brushing teeth, changing clothes, or cleaning or otherwise changing the scene, prior to a medical/legal exam. Police officers will provide guidance in preserving items necessary for investigation.

Preserving Evidence for Victims of Stalking

Victims of stalking should save evidence such as letters, notes, emails, phone calls, videos, photos, texts, social media postings (Facebook, Twitter, etc.), computer screenshots, voicemails, or any other form of evidence.

Counseling and Victim Support

VERVE COLLEGE and Oak Brook/Chicago Police Departments will work to assure victims have access to confidential counseling from counselors trained in sexual assault crisis intervention. VERVE COLLEGE does not have counselors on staff that is available to students but will assist victims in seeking support.

Victims also have access to the following resources:

Campus Staff: Oak Brook (630) 705-9999;
Chicago (312) 920-8822

Local Police: 911

Local Emergency Room – Oak Brook

Advocate Good Samaritan Hospital

3815 Highland Avenue

Downers Grove, IL 60515

630-275-5900

Elmhurst Memorial Hospital

155 E Brush Hill Rd

Elmhurst, IL 60126

331-221-1000

Alexian Brothers Medical Group

1339 W. Lake St

Addison, IL 60101

630-930-5600

Local Emergency Room – Chicago

UIC Medical Center

1740 West Taylor Street

Chicago, IL 60612

312-355-4000

Taylor Medical Center

1159 West Taylor Street

Chicago, IL 60607

312-226-6532

Chicago Center for Family Health

20 North Wacker Drive, Suite 1900

Chicago, IL 60606

312-732-5949

Assistance & Outreach Center

205 West Randolph Street Suite 1401

Chicago, IL 60606

312-578-7000

Person of Contact in case of Sexual Harassment or Sexual Assault:

Oak Brook Campus:

Ash Bindra

Student Services Manager

630-705-9999

ash@vervecollege.edu

Chicago Campus:

Miriam Escalante

Admission Advisor

312-920-8822

miriam@vervecollege.edu

Sexual Assault Victim Bill of Rights

In compliance with federal law, VERVE COLLEGE will adhere to the following Sexual Assault Victim Bill of Rights. Any disciplinary hearings described below refer to VERVE COLLEGE internal conduct proceedings only and do not relate to criminal or civil proceedings in any court of law.

1. Victims shall be informed of their options to notify law enforcement. VERVE COLLEGE will assist with notifying law enforcement personnel, if the victim so desires.
2. Victims shall be notified of counseling services available.
3. Victims shall be notified of options for changing their academic schedule and VERVE COLLEGE will support any reasonable alternative academic and/or arrangements requested by the victim.
4. Both the accuser and the accused have the right to have others present during any disciplinary proceeding conducted by VERVE COLLEGE.
5. Both the accuser and the accused shall be informed in writing of the outcome of any VERVE COLLEGE disciplinary proceeding.

Institutions must, upon written request, disclose to the alleged victim of any crime of violence or a non-forcible sex offense, the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of the crime or offense, the information shall be provided, upon request, to the next of kin of the alleged victim.

Sexual Harassment

VERVE COLLEGE is committed to creating and maintaining an environment free from sexual harassment. VERVE COLLEGE works to prevent harassment and will take immediate action when allegations of sexual harassment are made. Retaliation is prohibited against an individual who has brought forward a complaint of sexual harassment and/or has taken part in an investigation as a result of a sexual harassment complaint. VERVE COLLEGE Policy for Prohibition of Discrimination, Harassment, and Retaliation may be found in this ASR.

Sexual Violence Prevention and Education Programs

DHS Sexual Assault Prevention Program
Illinois Department of Human Services
1-800-843-6154

Safe Passage
P.O. Box 621
DeKalb, IL 60115
(815) 756-5228

Mujeres Latinas En Accion
(888) 293-2080
2124 W. 21st Place
Chicago , IL 60608
(773) 890-7676
Website: <http://www.mujereslatinasenaccion.org/SA.html>
Counties Served: Cook

Rape Victim Advocates (RVA)

(888) 293-2080
180 N. Michigan Avenue
Chicago , IL 60601
(312) 443-9603
Website: <http://www.rapevictimadvocates.org>
Counties Served: Cook

RVA - Austin Community

(888) 293-2080
4909 W. Division Street
Chicago , IL 60651
(773)-287-6057
Website: <https://www.rapevictimadvocates.org>
Counties Served:
Chicago neighborhoods of Austin, Garfield Park,
West Garfield Park, Belmont Cragin and the suburb
Oak Park.

RVA - Northside Office

1945 W. Wilson
Chicago, IL 60651
1-773-275-8340
Website: <http://www.rapevictimadvocates.org>
Counties Served: Northside of Chicago

RVA-Cook County Hospital Satellite

(888) 293-2080
1901 W. Harrison, Ste. 419
Chicago , IL 60612
(312) 864-6112

YWCA Metro Chicago – Parks and Francis Center

(888) 293-2080
6600 S. Cottage Grove Ave.
Chicago , IL 60637
(773) 955-3100
Website: <http://ywcachicago.org/harris.htm>
Counties Served: Chicago neighborhoods of Englewood,
Woodlawn, Grand Boulevard, South Shore, Chatham,
Avalon Park, Ashburn, Auburn Gresham, Beverly, Kenwood,
Washington Park, South Chicago, and Hyde Park.
Services include specialized counseling for child, adolescent
and adult survivors, assistance with interfacing with
medical, law enforcement and court systems, and
presentations for civic, community and professional groups

YWCA Metropolitan Chicago

(888) 293-2080
1 N. LaSalle Street Suite 1150
Chicago , IL 60602
(312) 762-6600
Website: <http://www.ywcachicago.org/programs.html?nxc=298>
Counties Served: Chicago Loop

The YWCA Sexual Violence and Support Services
provides a variety of crisis intervention and
support services to sexual assault victims, both
adults and children. The center works to prevent
sexual violence through education programs for
youths and oversees a school-based family
violence prevention program.

YWCA Metropolitan Chicago – Englewood Satellite

(888) 293-2080
641 W. 63rd Street
Chicago , IL 60621
(773) 783-1031
Counties Served:

The YWCA Harriet M. Harris Center serves
Woodlawn and other South Side communities
through the YWCA Harris Center, Englewood
and Roseland Satellites.

YWCA Metropolitan Chicago – Logan Square

(888) 293-2080
2858 W. Diversey
Chicago , IL 60647
(773) 862-3100
Website: <http://ywcachicago.org/logansq.htm>
Counties Served: Chicago neighborhoods of
Logan Square, Wicker Park and Humboldt Park.

The Logan Square Satellite addresses the needs
of a community that includes a large Latino
population. Services are adapted to their needs
and include counseling and support in Spanish.

YWCA Metropolitan Chicago RISE Children's Center

(888) 293-2080
820 W. Jackson Blvd. Ste. 550
Chicago , IL 60607
(312) 733-2102
Website: <http://ywcachicago.org/rise.htm>

Counties Served:

RISE offers supportive services for children and youth from 3 years to 17 years of age. The program's goal is to reduce the short- and long-Term trauma symptoms for child sexual abuse victims and their non-offending significant others. Free, confidential services are available.

Resilience Empowering Survivors Ending Sexual Violence

180 N. Michigan Ave. Suite 600
Chicago, IL 60601
Phone: (312) 443-9603
<https://www.ourresilience.org/>

Western Illinois Regional Council

133 W Jackson Street
Macomb, IL 61455
Office: (309) 837-3941
Fax: (309) 836-3640
Email: wirc@wirpc.org
<http://wirpc.org/>
SAFE: Crisis Intervention

24-Hour Hotline 1-800-625-1414

- 1410 Sunset Dr., Suite G.
Vandalia, IL 62471
Phone: (618) 283-1414
- 1108 S Willow St., Suite 12,
Effingham, IL 62401
Phone: (217) 342-6623
- 730 E 2nd St.,
Centralia, IL 62801
Phone: (618) 533-0475
- 123 S 10th St., Suite 302,
Mt. Vernon Illinois, 62864
Phone: (618) 244-9330

Hours Operation

Monday-Friday, 8:30 am to 4:00 pm
<https://www.safecrisiscenter.org/>

Crime Prevention and Safety

During the first week of the class of a new cohort, students are informed by a presentation outlining ways to maintain personal safety, campus security, and prevention of crimes. Students are informed about procedures for reporting crime on campus. A common theme of the program is to encourage students to be aware of their responsibility for their own security and the security of others. In addition, there is annual training for Staff and faculty.

VERVE COLLEGE employees and students are encouraged to take an active role in their personal safety and security. Each individual is expected to take precautions and act responsibly concerning their personal safety, the security of their possessions, and the safety of others. Suspicious individuals or unusual incidents on-campus should be reported to administration. Individuals should seek to avoid situations which leave them vulnerable to possible bodily harm. Walking alone at night on or around campus is discouraged.

VERVE COLLEGE facilities and grounds are maintained by the building management to minimize hazardous conditions. Necessary repairs to parking lots, sidewalks, and buildings are made as needed by the building management. Administration reports malfunctioning lights and other conditions that may indicate or result in an unsafe environment to the building management for correction.

VERVE COLLEGE's Financial Aid and Student Services department cooperates to offer training to new employees and students on emergency procedures.

Verve College does not have any officially recognized student organizations with non-campus locations

VERVE COLLEGE does not currently have any programs designed to inform students and employees about crime prevention on campus.

Risk Reduction

The following are strategies to reduce one's risk of sexual assault or harassment. This does not mean victims are to blame. For more information, see the Rape, Abuse, & Incest National Network at www.rainn.org.

1. Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
2. Try to avoid isolated areas. It is more difficult to get help if no one is around.
3. Walk with purpose. Even if you don't know where you are going, act like you do
4. Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
5. Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
6. Make sure your cell phone is with you and charged and you have cab money.
7. Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
8. Avoid putting headphones in both ears so you can be more aware of your surroundings, especially if you are walking alone.
9. Don't leave your drink unattended. If you've left your drink alone, just get a new one
10. Watch out for your friends, and vice versa. If a friend is intoxicated, or acting out of character, get him or her to a safe place immediately
11. If you suspect you or a friend have been drugged, call 911 immediately.
12. If you need to get out of an uncomfortable or scary situation:
 - A. Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason.
 - B. Have a code word with friends or family so if you don't feel comfortable you can call and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave
 - C. It's okay to lie. It is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse.

Bystander Intervention Information

If anyone suspects a friend, acquaintance, or stranger may be in a high-risk situation for becoming a victim, is being victimized, or has been a victim of any form of sexual offense, including dating violence, domestic violence, sexual assault, or stalking, it is important to decide as a bystander whether there is a safe and reasonable way to intervene effectively to assist a person before, during, or after an incident takes place.

While there is no legal obligation for a bystander to act or intervene, VERVE COLLEGE promotes a campus culture of respect and concern for others, creating a community of responsible citizens. The following are suggestions for safe and positive bystander actions.

1. Take steps to stop a friend who chooses to use violence.
2. Ask a friend, acquaintance, or stranger who is attempting to take sexual advantage of another to stop and leave the location.
3. Take the initiative to help friends who aren't thinking clearly to avoid becoming targets of violence
4. Don't leave a friend or acquaintance alone at a bar.
5. Prevent a friend or acquaintance from going to a private location with an intoxicated person.
6. Recognize dating or domestic partners who cause fear or physical pain to their partner, and voice your concerns when appropriate.
7. Encourage a friend or acquaintance to seek assistance from a counselor.
8. Contact Security, Human Resources, Student Affairs, or another person of authority who can assist.
9. Call 911 if there is immediate danger.
10. Report the incident to VERVE COLLEGE's CSA.

Alcohol and Drug Abuse Policies

VERVE COLLEGE encourages a wellness model for the entire institution and recognizes its responsibility to support and promote activity that prevents disease and minimizes health risks. In order to meet this standard, VERVE COLLEGE established the Drug and Alcohol Abuse Prevention Program (DAAPP) designed to educate students and employees of the health risks of alcohol and drug abuse and available resources for addiction. This program complies with the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act of 1989. VERVE COLLEGE's DAAPP follows the guidelines provided by the Education Department General Administrative Regulations (EDGAR) Part 86. EDGAR Part 86

establishes three primary areas of compliance: annual notification, method of distribution, and biennial review.

VERVE COLLEGE actively supports a drug and alcohol-free campus and workplace. VERVE COLLEGE's standard of conduct prohibits all employees from possessing, reporting to work, or working under the influence of intoxicants (non-prescribed drugs, narcotics, alcohol, etc.) or the illegal possession, manufacture or use of drugs or alcohol in the workplace. The VERVE COLLEGE Drug and Alcohol Abuse Prevention Program (DAAPP) is distributed to all VERVE COLLEGE employees, as follows:

- Newly hired employees receive a DAAPP policy and are required to return a signed statement within thirty (30) calendar days of the employee's start date indicating they have received, read, and understood the policy;
- All employees receive annual notification of the DAAPP policy and its specific online location via email;
- All employees participate in annual training; and
- All employees have unhindered access to the policy on VERVE COLLEGE's intranet web portal, including access to printed versions upon request.

The DAAPP policy addresses drug and alcohol issues as they pertain to students. The DAAPP policy is distributed to all VERVE COLLEGE students, as follows:

- All applicants to VERVE COLLEGE can access the DAAPP on VERVE COLLEGE's websites and a hard copy of the policy will be provided upon request;
- All current VERVE COLLEGE students receive notification at the beginning of each semester and on October 1st of each year via email that includes a PDF attachment and the website link to the DAAPP;
- Newly admitted students, transfer students, and students returning after a withdrawal are provided a notification upon enrollment and on October 1st of each year via email that includes a PDF attachment and the website link to the DAAPP.
- Directions on how to access the DAAP are reiterated during new student orientation.

Disciplinary sanctions for employees and faculty/staff Impairment Intervention Protocol are found on pages 9, 24, and 36 of this ASR.

Drug and Alcohol Abuse Prevention Program addresses the prohibition and penalties for the unlawful use, possession, or distribution of illegal drugs and alcohol by students, along with inappropriate or unprofessional use of alcohol and drugs. Violations of the Code of Behavioral Conduct may result in suspension, referral for prosecution, dismissal, or imposition of a lesser sanction.

The use of alcoholic beverages on both the Chicago and Oak Brook VERVE COLLEGE campus is strictly prohibited. All state and federal laws governing the use of alcohol must be obeyed, including the prohibition of possession of alcohol by persons under 21 years of age.

Programs available for persons needing assistance with drug or alcohol counseling include:

- Center for Substance Abuse Treatment www.samhsa.gov/treatment
- Alcoholics Anonymous (AA) www.aa.org
- Narcotics Anonymous (NA) www.na.org

Drug and Alcohol Abuse Prevention Program

The school is committed to protecting the safety, health and well-being of its employees and students and recognizing that abuse of alcohol and other drugs compromises this dedication. This drug policy is designed to assist staff and students to benefit from an alcohol/drug free lifestyle.

A school that participates in the FSA programs must provide drug and alcohol- prevention information to its students, faculty, and employees each year.

In addition, a school that participates in the Campus-Based programs must have a drug-free awareness program for its employees, which include a notice to its employees of unlawful activities and the actions the school will take against an employee who violates these prohibitions.

****Information from the 2022-2024 FSA Handbook, 2-160 ****

Helpful Websites:

http://www.brainsource.com/brain_on_drugs.htm

<http://www.drugabuse.gov/drugs-abuse>

DRUG FREE CAMPUS GUIDELINES

In compliance with the Drug-Free Schools and Communities Act (DFSCA), the school has set forth in this guide the legal penalties under Federal law for the illegal possession or distribution of drugs and alcohol, as well as the range of school sanctions that can be imposed for violation of the school's policies regarding substance abuse. Both students and employees should read this carefully.

Policy:

The United States Department of Education has issued regulations for the implementation of the provisions of the "Drug-Free Schools and Communities Act Amendments of 1989" (Public law 101-226). The school will distribute annually to each student and employee information regarding the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on school property.

Standards of Conduct:

The school is committed to a campus free of illegal drug use, misuse and abuse of prescription drugs, underage drinking and alcohol abuse. The school has no tolerance for illegal activity or any other harmful conduct influenced by drugs or alcohol. Unlawful possession as well as the distribution of illegal drugs or alcohol is prohibited on school property or as part of its activities. The school will cooperate fully with law enforcement agencies and will apply appropriate internal disciplinary processes should a student or an employee violate criminal statutes with regard to illegal drugs or possession or sale of alcohol.

The following shows the Federal penalties:

Federal Trafficking Penalties for Schedules I, II, III, IV, and V (except Marijuana)				
Schedule	Substance/Quantity	Penalty	Substance/Quantity	Penalty
II	Cocaine 500-4999 grams mixture	First Offense: Not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Second Offense: Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	Cocaine 5 kilograms or more mixture	First Offense: Not less than 10 yrs. and not more than life. If death or serious bodily injury, not less than 20 yrs. or more than life. Second Offense: Not less than 20 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual. 2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
II	Cocaine Base 28-279 grams mixture		Cocaine Base 280 grams or more mixture	
IV	Fentanyl 40-399 grams mixture		Fentanyl 400 grams or more mixture	
I	Fentanyl Analogue 10-99 grams mixture		Fentanyl Analogue 100 grams or more mixture	
I	Heroin 100-999 grams mixture		Heroin 1 kilogram or more mixture	
I	LSD 1-9 grams mixture		LSD 10 grams or more mixture	
II	Methamphetamine 5-49 grams pure or 50-499 grams mixture		Methamphetamine 50 grams or more pure or 500 grams or more mixture	
II	PCP 10-99 grams pure or 100-999 grams mixture	PCP 100 grams or more pure or 1 kilogram or more mixture		
Substance/Quantity		Penalty		
Any Amount Of Other Schedule I & II Substances		First Offense: Not more that 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine \$1 million if an individual, \$5 million if not an individual.		
Any Drug Product Containing Gamma Hydroxybutyric Acid		Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.		
Flunitrazepam (Schedule IV) 1 Gram				
Any Amount Of Other Schedule III Drugs		First Offense: Not more than 10 yrs. If death or serious bodily injury, not more that 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual. Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.		
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)		First Offense: Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual. Second Offense: Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.		
Any Amount Of All Schedule V Drugs		First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual. Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.		

Federal Trafficking Penalties for Marijuana, Hashish and Hashish Oil, Schedule I Substances	
Marijuana 1,000 kilograms or more marijuana mixture or 1,000 or more marijuana plants	<p>First Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.</p> <p>Second Offense: Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.</p>
Marijuana 100 to 999 kilograms marijuana mixture or 100 to 999 marijuana plants	<p>First Offense: Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.</p> <p>Second Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50million if other than an individual.</p>
Marijuana 50 to 99 kilograms marijuana mixture, 50 to 99 marijuana plants	<p>First Offense: Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.</p> <p>Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.</p>
Hashish More than 10 kilograms	
Hashish Oil More than 1 kilogram	
Marijuana less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight)	<p>First Offense: Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.</p> <p>Second Offense: Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual.</p>
1 to 49 marijuana plants	
Hashish 10 kilograms or less	
Hashish Oil 1 kilogram or less	

Health Risks

The following briefly summarizes health risks and symptoms associated with the use of alcohol and other drugs. It is important to note that individuals experience alcohol and drugs in different ways based on physical tolerance, body size and gender, and on a variety of other physical and psychological factors.

Alcohol:

Alcohol consumption causes a number of changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasingly the likelihood that the driver will be involved in an accident. Low to moderate doses of alcohol also increase the incidence of a variety of aggressive acts. Moderate to high doses of alcohol cause marked impairments in higher mental functions severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described. Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations and convulsions. Long-term consumption of large quantities of alcohol can also lead to permanent damage to vital organs such as the brain and the liver. Mothers who drink during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical

abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk than others of developing alcohol related problems.

Cigarettes and other Nicotine Products:

In 1989, the U.S. Surgeon General issued a report that concluded that cigarettes and other forms of tobacco, such as cigars, pipe tobacco and chewing tobacco, are addictive and that nicotine is the drug in tobacco that causes addiction. In addition, the report determined that smoking was a major cause of stroke and the third leading cause of death in the United States. Nicotine is both a stimulant and a sedative to the central nervous system. Nicotine is absorbed readily from tobacco smoke in the lungs, and it does not matter whether the tobacco smoke is from cigarettes, cigars, or pipes, Nicotine also is absorbed readily when tobacco is chewed.

In addition to nicotine, cigarette smoke is primarily composed of a dozen gases (mainly carbon monoxide) and tar. The tar in a cigarette, which varies from about 15 mg for a regular cigarette to 7 mg in a low-tar cigarette, exposes the user to a high expectancy rate of lung cancer, emphysema, and bronchial disorders. The carbon monoxide in the smoke increases the chance of cardiovascular diseases. The Environmental Protection Agency has concluded that secondhand smoke causes lung cancer in adults and greatly increases the risk of respiratory illnesses in children and sudden infant death.

Prescription Medications:

Prescription drugs that are abused or used for non-medical reasons can alter brain activity and lead to dependence. Commonly abused classes of prescription drugs include opioids (often prescribed in the treatment of pain), central nervous system depressants (often prescribed to treat anxiety and sleep disorders), and stimulants (prescribed to treat narcolepsy, ADHD, and obesity). Long-term use of opioids or central nervous system depressants can lead to physical dependence and addiction. Taken in high doses, stimulants can lead to compulsive use, paranoia, dangerously high body temperatures and irregular heartbeat.

Marijuana:

Marijuana use can lead to a number of long term and short term physical and psychological effects. Marijuana use leads to a substantial increase in the heart rate, impairs short term memory and comprehension and motivation can be altered.

Cocaine and Crack:

Health risks may include changes in body temperature and blood pressure as well as heart and breathing rates. Even small amounts may cause the body to exceed its own limits, sometimes resulting in death. Snorting cocaine may severely damage nasal tissue and the septum. Smoking cocaine may damage the lungs. Someone using cocaine may experience muscle twitching, panic reactions, anxiety, numbness in hands and feet, loss of weight, a period of hyperactivity followed by a crash, a runny or bleeding nose, and depression. Other symptoms of cocaine use may include nausea, vomiting, insomnia, tremors, and convulsions. Chronic users may become paranoid and/or experience hallucinations.

Barbiturates:

In small doses, barbiturates produce calmness, relaxed muscles, and lowered anxiety. Larger doses cause slurred speech, staggering gait, and altered perception. Very large doses or doses taken in combination with other central nervous system depressants (e.g., alcohol) may cause respirator depression, coma and even death. A person who uses barbiturates may have poor muscle control, appear drowsy or drunk, become confused, irritable, or inattentive, or have slowed reactions.

Amphetamines:

Amphetamines, methamphetamines, or other stimulants can cause increased heart rate and respiratory rates, elevated blood pressure, and dilated pupils. Larger doses cause rapid or irregular heartbeat, tremors, and physical collapse. An amphetamine injection creates a sudden increase in blood pressure that can result in stroke, high fever, heart failure and death. An individual using amphetamines might begin to lose weight, have the sweats, and appear restless, anxious, moody, and unable to focus. Extended use may produce psychosis, including hallucinations, delusions and paranoia.

Hallucinogens:

PCP, or angel dust, interrupts the part of the brain that controls the intellect and keeps instincts in check. PCP blocks pain receptors. Violent episodes, including self-inflicted injuries, are not uncommon. Chronic users report memory loss and speech difficulty. Very large doses produce convulsions, coma, heart and lung failure, or ruptured blood vessels in the brain. LSD, mescaline, peyote, etc. cause dilated pupils, elevated body temperature, increased heart rate and blood pressure and tremors. Someone under the influence of PCP might appear moody, aggressive, or violent. Sleeplessness, confusion, anxiety, and panic, and may report perceptual distortions. Flashbacks may occur.

Steroids (anabolic):

Anabolic steroids are human-made substances related to male sex hormones. Some athletes abuse anabolic steroids to enhance performance. Abuse of anabolic steroids can lead to serious health problems, some of which are irreversible. Short term side effects include depression, hallucinations, paranoia, severe mood swings and aggressive behavior. Major side effects also can include liver tumors and cancer, jaundice, high blood pressure, kidney tumors, severe acne and trembling. In males side effects may include shrinking of the testicles and breast development. In females, side effects may include growth of facial hair, menstrual changes and deepened voice. In teenagers, growth may be halted prematurely and permanently.

Narcotics:

Because narcotics are generally injected, the use of contaminated needles may result in the contraction of many different diseases, including AIDS and hepatitis. Symptoms of overdose include shallow breathing, clammy skin, convulsions, and coma and may result in death. Some signs of narcotic use are euphoria, drowsiness, constricted pupils, and nausea. Other symptoms include itchy skin, needle or “track” marks on the arms and legs, nodding, lack of sex drive and appetite, sweating, cramps and nausea when withdrawing from the drug.

Treatment:

Medication and behavioral therapy, alone or in combination, are aspects of an overall therapeutic process that often begins with detoxification, followed by treatment and relapse prevention. Easing withdrawal symptoms can be important in the initiation of treatment; preventing relapse is necessary for maintaining its effects. And sometimes, as with other chronic conditions, episodes of relapse may require a return to prior treatment components. A continuum of care that includes a customized treatment regimen, addressing all aspects of an individual's life including medical and mental health services, and follow-up options (e.g. community or family based recovery support systems) can be crucial to a person's success in achieving and maintaining a drug-free lifestyle.

PREVENTION AND ASSISTANCE

Students, staff or faculty members who feel they need assistance can contact the Manager. Everyone is encouraged to be familiar with local resources available to help with substance abuse, counseling, treatment, and interventions. Below are some local resources available.

ALCOHOL

SM AND DRUG DETOX HELP

106 West Calendar Ct Suite 142

LaGrange, IL 60525

Phone: (708) 393-2994

Gateway Foundation Alcohol & Drug Treatment
Centers – Chicago River North

415 N Dearborn St#510,

Chicago, IL 60654

Phone: (312) 535-4601

Gateway Alcohol & Drug Treatment Centers –
Chicago Independence

3828 W. Taylor St

Chicago, IL 60624

Phone: (773) 219-0344

Behavioral Service Center

8707 Skokie, IL Blvd. #207

Skokie, IL 60077

Phone: (847) 673-8577

Cornell Intervention

Chicago, Hinsdale, Woodridge

Phone: (773) 737-4600

DRUG AND ALCOHOL TREATMENT RESOURCES

Advanced Therapeutic Solutions

Oak Brook, IL 60523

Phone: (630)-426-3205

Shared Vision Psychological Services, Inc.

Oak Brook, IL 60523

Phone: (630) 882-3527 X224

The Anxiety Treatment Center of Greater Chicago

Phone: (312)614-1612

The Treatment Hotline - Guiding You To Recovery

Chicago, IL 60606

888-983-2126

Changes Treatment and Recovery Center

Chicago, IL 60606

888-409-5704

Breaking Free

120 Gale St

Aurora, IL

Chicago Drug Rehabilitation

11 W Jackson

Chicago IL

312-604-7346

Substance Abuse Rehabilitation

230 S Clark

Chicago, IL

312.757.4122

Evanston Substance Abuse Prevention Coalition
906 Davis St.
Evanston, IL 60201
Phone: (847) 492-1778 ext. 1308
<https://www.esapcoalition.org/>

Positive Sobriety Institute Alcohol & Drug Rehab
Chicago
680 N Lake Shore Dr. Unit 800
Chicago, IL 60611
Phone: (312) 588-6775
<https://www.positivesobrietyinstitute.com/>

Treatment Centers of Illinois/Lombard Treatment
5 E Ash St.
Lombard, IL 60148
Phone: (630) 705-0556
<http://www.treatmentcentersofillinois.com/>

Treatment Centers of Illinois/Hanover Park
Treatment
1734 W Wise Rd.
Schaumburg, IL 60193
Phone: (630) 705-0556
<http://www.treatmentcentersofillinois.com/>

Banyan Treatment Centers – Chicago
50 S Main St #290,
Naperville, IL 60540
Phone: (630) 528-1692
https://www.banyanchicago.com/?utm_source=GMBlisting&utm_medium=organic

School Disciplinary Sanctions:

It is the school policy to discourage all violations of Federal, State or local laws by any member of the school community. In addition to possible prosecution and punishment by civil authorities, a student or employee violating any law may be subject to sanctions imposed by the school.

Students:

Sanctions against students include, but are not limited to, disciplinary expulsion, suspension, and/or probation. When appropriate, school sanctions may be entered into permanent records. Parents of dependent students will be notified of pending charges or subsequent decisions.

Faculty:

Faculty who violate the school's standards of conduct are subject to disciplinary action including reprimand, suspension, or dismissal.

Other Employees:

The school may impose sanctions against any employee who violates Federal, State or local laws, or the standards of school conduct. Depending on the nature and severity of the violation, these sanctions can range from warnings and/or mandatory referral for drug or alcohol rehabilitation to outright termination of employment.

Students and employees should know that their behavior and actions are subject to all local, state, and federal laws relating to drug and alcohol abuse. VERVE COLLEGE will bring violations of the standards to the attention of local and or proper law enforcement authorities.

Registered Sex Offenders

Under provisions of the Campus Crimes Sex Prevention Act of 2000, an amendment to the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act (Wetterling Act), any person who is required to register under a state sex offender registration program must notify the state when he or she enrolls at an institution of higher education or is employed at an institution of higher education. Sex offender registration information is to be transmitted from each state to the law enforcement entities where the registered sex offender resides. One can access the sex offender registry for the state of Illinois at the following site:

<https://www.isp.state.il.us/sor/>

Definitions –Federal Law

Sex Offenses (FBI UCR) – Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent

- Rape (FBI UCR) – 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 (Definition effective 01/01/13 from FBI UCR).
- Sodomy - Oral or anal sexual intercourse with another person, 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 or physical incapacity.
- Sexual Assault With An Object -The use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, 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 or physical incapacity (Please note that a finger or hand is also considered an object)
- Fondling (FBI UCR) - 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 or physical incapacity

Non-Forcible Sex Offenses (FBI UCR) - Unlawful, non-forcible sexual intercourse.

- Incest (FBI UCR) - Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law
- Statutory Rape (FBI NIBRS) – Non-forcible sexual intercourse with a person who is under the statutory age of consent (See page 40 of “The National Incident Based Reporting System Edition of the Uniform Crime Reporting Program 2013 Handbook (NIBRS)”.

Federal Law – Violence Against Women Act (VAWA) Crime Categories Additions

Definitions used in section the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)). After completion of the negotiated federal rule making process, these definitions will be codified in 34 CFR 668.48(a).

- Domestic Violence - Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person cohabitating with or has cohabitated with the victim as a spouse, 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.
- Dating Violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.
 1. 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
 2. For the purpose of this definition
 - A. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - B. Dating violence does not include acts covered under the definition of domestic violence
- Stalking-
 1. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to
 - A. Fear for the person’s safety or the safety of others; or
 - B. Suffer substantial emotional distress.
 2. For the purpose of this definition –
 - A. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person’s property

- B. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- C. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim

Other Definitions

- Awareness programs: Community-wide or audience specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration.
- Bystander intervention: Safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking.

Bystander intervention includes:

- Recognizing situations of potential harm
- Understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking actions to intervene
- Ongoing prevention and awareness campaign: Programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution.
- Primary prevention programs: Programming initiatives, and strategies informed by research or assessed for value, effectiveness, or outcome that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe directions.
- Proceeding: All activities related to a non-criminal resolution of an institutional disciplinary complaint, including, but not limited to, fact finding investigations, formal or information meetings, and hearings. Proceeding does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim.
- Result: Any initial, interim, and final decision by any official or entity authorized to resolve disciplinary matters within the institution. The result must include any sanctions imposed by the institution.
- Risk reduction: Options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

- Unfounded crimes: An institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situations where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of this full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore “unfounded.” Only sworn or commissioned law enforcement personnel may make this determination. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not “unfound” a crime report.

Crime Statistics

VERVE COLLEGE complies with all Clery Act requirements to report and disclose crime statistics on a calendar-year basis, in accordance with the definitions of crimes provided by the FBI for use in the Uniform Crime Reporting system. Categories of crime statistics include criminal offenses; hate crimes; arrests and referrals for disciplinary action for weapons, drug abuse and liquor law violations; and offenses under the Violence Against Women Act (dating violence, domestic violence, and stalking). Crime statistics include those reported to Campus Security Authorities, and Oak Brook and Chicago Police Departments.

Disclosure of Crime Statistics

Crime statistics for 2022, 2023, and 2024 are found in the “Crime Statistics” section of this ASR. VERVE COLLEGE posts reportable crime statistics for public access at <http://ope.ed.gov/security/>. Yearly disclosures of crime statistics to students and employees occur in accordance with the “Report Distribution” section of this ASR

Geography of Crimes

Clery Act regulations (34 CFR 668.46) define geographic categories as follows:

1. On-campus.

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic areas 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 paragraph (1) 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 food or other retail vendor).

Crimes at on-campus student housing facilities are also reported as a subset of on campus crimes (34 CFR 668.41(a)). Oak Brook campus does not have on-campus student housing; Chicago campus does not have on-campus student housing.

2. Non-campus.

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

3. 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.

Public property refers to property owned by a public entity, such as a city or state government.

Report Distribution

The 2024 Annual Security may be located electronically at:

<https://vervecollege.edu/annual-security-report/>

VERVE COLLEGE does not have a Fire Safety Report as VERVE COLLEGE does not have any on campus student housing facilities.

VERVE COLLEGE distributes the ASR annually to all current employees and active students, as follows:

1. Current employees:

- Newly hired employees receive an electronic version of the ASR and are required to return a signed statement within 30 calendar days of their start date indicating they have received, read, and understood the report;
- All employees receive annual notification of the ASR and its online location via email;
- All employees participate in annual training; and
- All employees have unhindered access to the ASR on VERVE COLLEGE's intranet web portal, and printed versions upon request.

2. Current students:

- All applicants to VERVE COLLEGE can access the ASR on VERVE COLLEGE's websites and a hard copy of the policy will be provided upon request;
- All current VERVE COLLEGE students receive notification at the beginning of each semester and on October 1st of each year via email that includes a PDF attachment and the website link to the ASR;

- Newly admitted students, transfer students, and students returning after a withdrawal are provided a notification upon enrollment and on October 1st of each year via email that includes a PDF attachment and the website link to the ASR.
- Directions on how to access the ASR are reiterated during new student orientation

In Oak Brook and Chicago, printed copies of the ASR are available by contacting VERVE COLLEGE Student Services Department:

VERVE COLLEGE-Oak Brook
Student Services Department
2625 Butterfield Rd., Suite 102E
Oak Brook, IL 60523
630.705.9999

VERVE COLLEGE- Chicago
Student Services Department
216 W. Jackson Blvd., Suite 900
Chicago, IL 60606
312.920.8822

Oak Brook Campus Crime statistics

Oak Brook Campus: Criminal Offenses Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
MURDER/NON- NEGLIGENT MANSLAUGHTER	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
MANSLAUGHTER BY NEGLIGENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
RAPE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
FONDLING	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
INCEST	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
STATUTORY RAPE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
ROBBERY	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
AGGRAVATED ASSAULT	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
BURGLARY	2024	1	N/A	0	0
	2023	0	N/A	1	0
	2022	0	N/A	0	0
MOTOR VEHICLE THEFT	2024	0	N/A	0	0
	2023	0	N/A	2	0
	2022	0	N/A	0	0
ARSON	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

Oak Brook: VAWA Offenses Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
DOMESTIC VIOLENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
DATING VIOLENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
STALKING	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

Oak Brook: Arrests and Disciplinary Referrals Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
Arrests: Weapons: Carrying, Possessing, Etc.	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Arrests: Drug Abuse Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Drug Abuse Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Arrests: Liquor Law Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Liquor Law Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

There were no reported Hate Crimes for the years 2022, 2023 or 2024 at the Oak Brook campus.

There were no unfounded crimes for the years 2022, 2023 or 2024 at the Oak Brook campus.

Chicago Campus Crime statistics

Chicago: Criminal Offenses Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
MURDER/NON- NEGLIGENT MANSLAUGHTER	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
MANSLAUGHTER BY NEGLIGENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
RAPE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
FONDLING	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
INCEST	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
STATUTORY RAPE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
ROBBERY	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
AGGRAVATED ASSAULT	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
BURGLARY	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
MOTOR VEHICLE THEFT	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
ARSON	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

Chicago: VAWA Offenses Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
DOMESTIC VIOLENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
DATING VIOLENCE	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
STALKING	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

Chicago: Arrests and Disciplinary Referrals Reporting Table					
OFFENSE	Year	Geographic Location			
		ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NONCAMPUS PROPERTY	PUBLIC PROPERTY
Arrests: Weapons: Carrying, Possessing, Etc.	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Arrests: Drug Abuse Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Drug Abuse Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Arrests: Liquor Law Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0
Disciplinary Referrals: Liquor Law Violations	2024	0	N/A	0	0
	2023	0	N/A	0	0
	2022	0	N/A	0	0

There were no reported Hate Crimes for the years 2022, 2023 or 2024 at the Chicago campus.

There were no unfounded crimes for the years 2022, 2023 or 2024 at the Chicago campus.

VERVE COLLEGE Policy for Prohibition of Discrimination, Harassment, and Retaliation Purpose

The purpose of this general order is to provide an employment and learning environment at VERVE COLLEGE. Still VERVE COLLEGE free from discrimination, harassment, and retaliation. Discrimination, harassment, or retaliation by anyone—managers, administrators, supervisors, co-workers, students, or non-VERVE COLLEGE personnel including clients, vendors, and suppliers—on the basis of race, color, religion, ethnicity, national origin, sex (including pregnancy), gender, sexual orientation, gender identity, age, disability, veteran status, or any other status protected by applicable law is a violation of VERVE COLLEGE policy and is prohibited by VERVE COLLEGE.

POLICY

VERVE COLLEGE does not discriminate on the basis of race, color, religion, ethnicity, national origin, sex (including pregnancy), gender, sexual orientation, gender identity, age, disability, or veteran status in admission or access to, or treatment or employment in its programs and activities. Dating violence, domestic violence, sexual assault (e.g. non-consensual sexual contact/intercourse), stalking, harassment, and retaliation are forms of discrimination prohibited by VERVE COLLEGE.

Any person who witnesses or has knowledge of incidents of discrimination, harassment, retaliation, or any other situation prohibited by this policy, should report such information to the persons listed in this general order. All reporting parties are protected from adverse action or retaliation under the provisions of this policy and by VERVE COLLEGE Policy: Whistleblower. Good faith reports, even if erroneous, will not result in punitive action. Deliberately false and/or malicious accusations of harassment are just as serious an offense as harassment and will be subject to appropriate disciplinary action

To report violations of VERVE COLLEGE's nondiscrimination policies, request information, or for assistance filing a police report, contact the following persons:

Oak Brook Campus:

Ash Bindra
Student Services Manager
630-705-9999
ash@vervecollege.edu

Chicago Campus:

Miriam Escalante
Admission Advisor
312-920-8822
miriam@vervecollege.edu

Discrimination complaints, reports, or questions may be directed to the VERVE COLLEGE Campus Manager at each respective campus.

A. Anti-Harassment

1. Prohibited conduct includes unwelcome conduct, whether verbal, non-verbal, physical, or visual, that is based on or relates to an individual's race, color, religion, ethnicity, national origin, sex (including pregnancy), gender, sexual orientation, gender identity, age, disability, veteran status, or any other status protected by applicable law, and
 - a. Has the effect of creating a hostile environment;
 - b. Has the effect of unreasonably interfering with an individual's work or student's performance; or
 - c. Otherwise adversely affects an individual's employment or education opportunities.
2. A hostile environment is any situation in which there is harassing conduct sufficiently severe, pervasive, or objectively offensive to alter the conditions of employment or limit, interfere with, or deny educational benefits or opportunities, from both a subjective (the alleged victim's) and an objective (a reasonable person standard) viewpoint.
3. The determination of whether an environment is "hostile" will be based upon the circumstances, including:
 - a. The frequency of the conduct;
 - b. The nature and severity of the conduct;
 - c. Whether the conduct was physically threatening;
 - d. Whether the conduct was humiliating;
 - e. The effect of the conduct on the alleged victim's mental or emotional state;
 - f. Whether the conduct was directed at more than one person;
 - g. Whether the conduct arose in the context of other discriminatory conduct;
 - h. Whether the conduct unreasonably interfered with the alleged victim's educational or work performance;
 - i. Whether the statement is an utterance of an epithet which engenders offense in an employee or student, or offends by mere discourtesy or rudeness;
 - j. Whether the speech or conduct deserves the protections of academic freedom or the First Amendment of the U.S. Constitution.
4. Examples of prohibited conduct include but are not limited to: jokes, epithets, slurs, insults, negative stereotyping, written or graphic material (including emails), or any threatening or intimidating acts, that denigrate or show hostility toward an individual and that relate to race, color, religion, ethnicity, national origin, sex (including pregnancy), gender, sexual orientation, gender identity, age, disability, veteran status, or any other status protected by applicable law.
5. Prohibited behavior also includes any unwelcome behavior of a sexual nature such as sexual advances and propositions; requests for sexual favors; sexual jokes, comments, suggestions, or innuendo; foul or obscene gestures or language; display of foul, obscene, or offensive printed or visual material; unwelcome physical contact of a sexual nature, such as bodily contact with the breast, groin, or buttocks; patting, pinching, hugging, or brushing against another individual's body; and any other unwelcome verbal, nonverbal, physical or visual conduct of a sexual nature where:
 - a. Submission to such conduct is an explicit or implicit condition of employment or education; or
 - b. Submission to or rejection of such conduct is used as a basis for employment-related or academic related decisions such as a promotion, discharge,

- performance evaluation, pay adjustment, discipline, work assignment, or any other condition of employment or career development or academic development; or
 - c. Such conduct has the effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, abusive, or offensive working or educational environment.
- 6. Non-consensual sexual contact and non-consensual sexual intercourse are explicitly prohibited by this policy.
 - a. Non-consensual sexual contact is any unwelcome intentional sexual touching, however slight, with any object, by a man or woman upon a man or woman.
 - b. Non-consensual sexual intercourse is any unwelcome sexual intercourse, however slight, with any object, by a man or woman upon a man or woman, without consent and/or by force.
 - c. Consent is clear, knowing, and voluntary. It may be given by words or actions, but silence itself cannot be interpreted as consent. Consensual words or actions create mutually understood, clear permission regarding willingness to engage in sexual activity. There is no definition of consent in your local jurisdiction
 - d. Force is the use of physical violence and/or imposing on someone physically to gain sexual access. Force also includes threats, intimidation, and coercion that overcome resistance or produce consent.
 - e. Sexual activity with someone whom one knows to be, or based on the circumstances should reasonably have known to be, mentally or physically incapacitated, constitutes a violation of this policy.
- 7. This policy applies universally to all VERVE COLLEGE employees and students in their dealings with each other and to all VERVE COLLEGE employees and students in their dealings with third parties. Any VERVE COLLEGE employee or student who violates this policy will be subject to corrective action up to and including termination or dismissal. VERVE COLLEGE employees or students may be disciplined, up to and including termination or dismissal, for engaging in behavior that is disrespectful, disruptive, or otherwise prohibited by this policy, regardless of whether that behavior constitutes harassment prohibited by law.
- B. Discrimination, harassment, and retaliation grievance procedures
 - 1. Any individual who feels he/she has witnessed or experienced behavior prohibited by this policy, or who has questions, concerns, or information regarding violations of this policy, should immediately report the circumstance(s) or incident(s) to his or her supervisor or one of the contact persons described in this policy.
 - 2. Upon receipt of a report of discrimination, harassment, or retaliation, VERVE COLLEGE will conduct a prompt, thorough, and impartial investigation, evaluating all relevant information and documentation relating to the report.
 - a. If a report is made, a VERVE COLLEGE student services team will meet with the reporting party to discuss the allegations and/or circumstances. The objectives of this initial meeting will be to reduce the report to writing, stop the harassment, prevent its recurrence, and take steps to remedy its effects in the interim.
 - b. If, following this meeting, it is determined no potential policy violations exist, the team will produce a report stating such conclusion, including all elements of the initial meeting and interim remedial steps taken.

- c. Interim remedial steps may include course or work adjustments, no contacts orders, temporary suspension of the alleged perpetrator, or any other reasonable measure to facilitate the end and prevention of harassment. VERVE COLLEGE does not issue orders of protection.
- d. If, after an initial meeting between a VERVE COLLEGE student services team and a reporting party, it is determined any part of this policy may have been violated, a full investigation will be conducted. The team will be appropriately trained and will not have a conflict of interest or bias against the reporting party or respondent. Such investigation will be concluded promptly, typically within fourteen (14) business days of the receipt of the report by the appropriate personnel. Investigations may, however, take longer based on a number of factors and variables, such as: the nature and detail of the notice received, the complexity of the investigation, and the cooperation level of the parties and witnesses. In almost all cases, investigations will be completed within sixty (60) business days, though this timeline may be extended for appropriate cause as determined by the investigator.
- e. The parties will be regularly updated as to the projected timeline for completion of the investigation. During the process, the reporting party and respondent will be given timely notice of any meetings at which either or both may be present, and will have equal opportunity to present witnesses, provide evidence, and have others present, including an advisor of their choice. The reporting party, respondent, and appropriate officials will be given timely and equal access to information to be used during informal and formal disciplinary meetings and hearings.
- f. The team uses the “preponderance of evidence” (more likely than not) standard when determining whether or not there is a violation.
- g. Simultaneous written notice to the parties describing the findings of the investigation, including determination of responsibility and sanctions, and available appeal procedures, will occur within five (5) business days of the completion of the investigation.
 - 1. Sanctions for employees may include a disciplinary warning to be added to the employee’s permanent file, probation, suspension with or without pay, and/or termination.
 - 2. Sanctions for students may include reprimand, a disciplinary warning to be added to the student’s permanent file, probation, suspension, and/or dismissal.
- h. The parties will have the right to appeal within five (5) business days of receiving the findings. If the appeal is not timely or substantively eligible, the original findings and sanctions will stand, and the decision will be final. If the appeal has standing, the documentation will be forwarded for consideration. The party requesting the appeal must show error as the original findings and sanctions are presumed to have been decided reasonably and appropriately. The only grounds for appeal are:
 - 1. A procedural (or substantive) error that significantly impacted the outcome of the hearing (e.g. substantiated bias, material deviation from established procedures).
 - 2. To consider new evidence, unavailable during the original hearing or investigation, that could substantially impact the original findings or

sanctions. A summary of this new evidence and its potential impact must be included.

3. The sanctions imposed are substantially disproportionate to those previously imposed for similar violations. Right to appeal under this provision is for the responding party only. No other party has the right to appeal sanctions.
 - i. Upon receipt of a written appeal, an appellate panel consisting of three (3) members will be selected to rule on the appeal.
 1. Members are appointed by the VERVE COLLEGE President.
 2. Members include the Title IX administration team, two (2) faculty members nominated by majority of the VERVE COLLEGE Faculty, and two (2) staff members nominated by VERVE COLLEGE Staff, and (2) nursing leadership/management members nominated by the Chief Operating Officer.
 - j. The appellate panel will rule on the appeal within fifteen (15) business days. Any extension of time beyond fifteen (15) business days will be communicated to both parties along with an updated timeframe for the ruling.
 - k. Any sanctions imposed at the conclusion of an investigation will remain in effect during the appeals process.
 - l. In the event an appeal is upheld by the appellate panel, the panel's report will be submitted to the investigators for redetermination based on the panel's findings. Written notice to the parties describing the revised findings of the investigation, including determination of responsibility and sanctions, will occur within five (5) business days of receipt of the appellate panel report.
- C. Anti-retaliation
1. VERVE COLLEGE will not retaliate against, nor permit retaliation against, any individual who opposes discrimination or harassment, makes a complaint of discrimination or harassment, and/or participates or cooperates in a discrimination or harassment investigation, proceeding, or hearing.
 2. Examples of retaliation:
 - a. After a whistleblowing incident, an employee may suddenly find herself being assigned to different duties or even moved into a different position. The new role often involves duties that are below the employee's capabilities or even demeaning in nature. The supervisor may make the new role as difficult as possible by harshly critiquing results or implementing unreasonable time constraints for completing projects. The supervisor may also limit access to resources the employee needs to complete her assigned tasks.
 - b. Employers may retaliate by excluding the employee from normal activities, attempting to create a sense of isolation. A supervisor may refuse to invite the employee to an important meeting or a social activity such as a group luncheon or outing. She may also exclude the employee from training sessions that could enhance the employee's job performance or opportunity for advancement. Exclusion can occur by relocating the employee to an area where she has little contact with other workers.
- D. Amnesty for drug/alcohol possession and consumption violations
1. VERVE COLLEGE strongly encourages students and employees to report potential violations of this policy. Therefore, good faith reporters to appropriate authorities

regarding potential violations will not face VERVE COLLEGE disciplinary action for their own drug/alcohol possession or consumption in connection with the reported incident.

2. Amnesty for persons making a report in good faith does not include substance abuse counseling and/or rehabilitation which may be necessary for employees or students with clinical responsibilities or patient contact.

Responsibility

- A. The Vice President/ COO is responsible for responding to and monitoring all complaints of discrimination, harassment, or retaliation from employees.
- B. The Vice President/ COO or the Nursing Administrator is responsible for responding to and monitoring all complaints of discrimination, harassment, or retaliation from students, members of the public, or beneficiaries.
- C. The Lead of Financial Aid is responsible for all sex- and gender-based harassment and discrimination awareness, prevention, training, monitoring, reporting, investigation, and resolution at VERVE COLLEGE.