



NORTHWEST  
CAREER COLLEGE

# 2017 ANNUAL SECURITY REPORT

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7398 Smoke Ranch Rd., Las Vegas, NV 89128

**702-254-7577**

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# Introduction and Purpose

## **Purpose of the Annual Security Report**

The “Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act” was enacted by Congress and signed into law in November 1990, and amended in 1992, 1998, 2000, and 2008. This law requires post-secondary institutions to provide statistics regarding the incidence of crime on our campus and information on our policies and procedures for maintaining a safe and secure environment for students, employees, and visitors while they are on campus. The Violence Against Women Reauthorization Act of 2013 (VAWA), among other provisions, amended the Clery Act to require institutions to compile statistics for incidents of domestic violence, dating violence, sexual assault, and stalking and to include certain policies, procedures, and programs pertaining to these incidents in their Annual Security Report (ASR).

Northwest Career College is committed to providing a safe learning and working environment for its students, faculty, staff and visitors. Safety is a community wide effort which requires awareness and diligence. On the campus of Northwest Career College, we take care to minimize potentially unsafe situations through our policies and procedures as well as encouraging everyone to take responsibility for their own security.

## **Annual Security Report Preparation Protocol**

Northwest Career College reviews its campus security policies and procedures on an annual basis to ensure that they continue to reflect current institutional practices and are compliant with Federal requirements. During this review, the Campus Security Authority and Director of Compliance both read the most current “Department’s Handbook for Campus Safety and Security Reporting” and the previous year’s ASR to identify any policies or procedures that need to be updated. Upon completion of this review, the Campus Security Authority and the Director of Compliance update the institution’s ASR. It is then published on the institution’s website and an email notification is sent to all current students and employees regarding its availability along with the web address for accessing the report. No new Handbook was published in 2017; therefore, the institution continued to use the department’s 2016 Handbook for reference during this year’s report preparation.

## **Definitions of Important Terminology**

Northwest Career College uses the following definitions throughout the Annual Security Report in reference to the terms listed below:

- **Dating Violence**: “Dating violence” means “violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. 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.” Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence. (34 C.F.R. § 668.46(a))

Nevada does not have an independent definition of “dating violence” in the Nevada Revised Statutes (NRS).

- **Domestic Violence**: A felony or misdemeanor crime of violence committed by: a current or former spouse or intimate partner of the victim; a person with whom the victim shares a child in common; a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or, any other person against an adult or youth

victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred. (34 C.F.R. § 668.46(a))

As defined in Nevada (NRS 33.018), "Domestic violence occurs when a person commits one of the following acts against or upon the person's spouse or former spouse, any other person to whom the person is related by blood or marriage, any other person with whom the person is or was actually residing, any other person with whom the person has had or is having a dating relationship, any other person with whom the person has a child in common, the minor child of any of those persons, the person's minor child or any other person who has been appointed the custodian or legal guardian for the person's minor child:

- (a) A battery.
- (b) An assault.
- (c) Compelling the other person by force or threat of force to perform an act from which the other person has the right to refrain or to refrain from an act which the other person has the right to perform.
- (d) A sexual assault.
- (e) A knowing, purposeful or reckless course of conduct intended to harass the other person. Such conduct may include, but is not limited to: (1) Stalking; (2) Arson; (3) Trespassing; (4) Larceny; (5) Destruction of private property; (6) Carrying a concealed weapon without a permit; and (7) Injuring or killing an animal.
- (f) A false imprisonment.
- (g) Unlawful entry of the other person's residence, or forcible entry against the other person's will if there is a reasonably foreseeable risk of harm to the other person from the entry.

As used in this section, "dating relationship" means frequent, intimate associations primarily characterized by the expectation of affectional or sexual involvement. The term does not include a casual relationship or an ordinary association between persons in a business or social context."

- Sexual Assault: Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. This includes but is not limited to any offense that meets the following definitions of rape, fondling, incest, or statutory rape.

As defined in Nevada (NRS 200.366), a person is guilty of sexual assault if he or she "(a) Subjects another person to sexual penetration, or forces another person to make a sexual penetration on himself or herself or another, or on a beast, against the will of the victim or under conditions in which the perpetrator knows or should know that the victim is mentally or physically incapable of resisting or understanding the nature of his or her conduct; or (b) Commits a sexual penetration upon a child under the age of 14 years or causes a child under the age of 14 years to make a sexual penetration on himself or herself or another, or on a beast."

- Rape: 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. This offense includes the rape of both males and females. (34 C.F.R. § 668 Subpart D Appendix A)  
Nevada does not have an independent definition of "rape" in the Nevada Revised Statutes (NRS).
- Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity. (34 C.F.R. § 668 Subpart D Appendix A)

Nevada does not have an independent definition of “fondling” in the Nevada Revised Statutes (NRS).

- Incest: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. (34 C.F.R. § 668 Subpart D Appendix A)

Nevada does not have an independent definition of “incest” in the Nevada Revised Statutes (NRS).

- Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent. (34 C.F.R. § 668 Subpart D Appendix A)

As defined in Nevada (NRS 200.364), statutory sexual seduction means “ordinary sexual intercourse, anal intercourse or sexual penetration committed by a person 18 years of age or older with a person who is 14 or 15 years of age and who is at least 4 years younger than the perpetrator.”

- Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress (34 C.F.R. § 668 Subpart D Appendix A). For the purposes of this definition, the following terms are used:

- *Course of Conduct*: 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. (34 C.F.R. § 668 Subpart D Appendix A)
- *Reasonable Person*: A reasonable person under similar circumstances and with similar identities to the victim. (34 C.F.R. § 668 Subpart D Appendix A)
- *Substantial Emotional Distress*: significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. (34 C.F.R. § 668 Subpart D Appendix A)

As defined in Nevada (NRS 200.575), stalking means a person “without lawful authority, willfully or maliciously engages in a course of conduct that would cause a reasonable person to feel terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member, and that actually causes the victim to feel terrorized, frightened, intimidated, harassed or fearful for the immediate safety of a family or household member, commits the crime of stalking.”

- Consent: An understandable exchange of affirmative words or actions that indicate a willingness to participate in mutually agreed upon sexually explicit touching or sexual penetration. Consent must be informed, and freely and actively given. It is incumbent upon each individual involved in the activity to either obtain or give consent prior to any sexual activity, and again, prior to sexual penetration. If at any time during the sexual interaction any confusion or ambiguity should arise on the issue of consent, it is incumbent upon each individual involved in the activity to stop and clarify, verbally, the other's willingness to continue.” (Georgetown University Health Education Services: What is Consent?, 2010.)

Nevada does not have an independent definition of “consent” in the Nevada Revised Statutes (NRS).

- Hate Crime: A crime reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. For the purposes of this section, the categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability. (34 C.F.R. § 668.46(a))

# **Institutional Security Policies**

## **Institutional Policy Statement**

Northwest Career College issues this report and the policies and procedures wherein as a statement of policy to inform the community of our comprehensive plan addressing sexual misconduct, educational programs, and procedures that address dating violence, domestic violence, sexual assault and stalking, whether the incident occurs on or off campus and when it is reported to a college official.

Northwest Career College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking and reaffirms its commitment to maintain a campus environment emphasizing the dignity and worth of all members of the college community. This policy applies equally to all students and employees regardless of the sex, gender, sexual orientation, gender identity, or gender expression of any of the individuals involved.

Northwest Career College reserves the right to dismiss any student from the school who violates these policies. Employees who violate these policies will be subject to disciplinary action, up to and including discharge.

## **Campus Security Features**

### **Personnel-Based Features**

Northwest Career College maintains staff at the front desk from 8:00 a.m. to 10:00 p.m. Monday through Thursday, 8:00 a.m. to 5:00 p.m. on Fridays, and 8:00 a.m. to 3:00 p.m. on Saturdays to monitor all visitors to the campus. Designated security personnel and supplemental support personnel are available to coordinate responses to emergencies or criminal activities that occur during business operation hours.

Northwest Career College maintains a policy that no students are left on campus after classes end without a staff member present. The facility is locked and all students are in their cars before the final staff member leaves the campus.

Northwest Career College contracts with a security company to monitor and secure all Northwest Career College facilities. Security system maintenance is provided on a consistent basis, and the security system is armed during all non-operational hours.

### **Facility-Based Features**

Northwest Career College maintains land-line phones throughout the campus should one be needed in case of an emergency.

Northwest Career College maintains video cameras throughout the campus, at main entrances and exits, and in the foyer to facilitate verification of reports regarding misconduct or criminal behavior. Notice is given in writing at the entrance to the campus.

Northwest Career College maintains a well-lit parking lot from dawn to dusk in addition to safety lights throughout the campus.

## **Campus Security Personnel**

### Designated Security Personnel

Students and employees should report the criminal offenses described in 34 CFR § 668.46(c) and the Crime Statistics section of the ASR to one of the following individuals for the purposes of making timely warning reports and the annual statistical disclosure:

- Campus Security Authority: Michael Kenny
- Chief Operating Officer: Patrick Kenny
- School Director: Dr. John Kenny
- Director of Regulatory Affairs: Dr. Thomas Kenny

These security personnel complete training annually on evaluation of relevant evidence and how it should be used during a proceeding; proper techniques for questioning witnesses; basic procedural rules for conducting a proceeding; and avoiding actual and perceived conflicts of interest.

### Supplemental Support Personnel

If a student or employee cannot immediately locate one of the designated support personnel, they are encouraged to ask the Student Services Representative, Receptionist, Office Manager, or Dean of Students for assistance so they may report the criminal offense in a timely manner.

### Pastoral or Professional Counselors

The institution does not employ on-campus pastoral or professional counselors. Pastoral counselors and professional counselors who contact the institution regarding a reported crime are directed to speak with designated security personnel. They are encouraged, if and when they deem it appropriate, to inform the persons they are counseling of the procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics contained within this report.

### Law Enforcement Authority and Jurisdiction of Campus Security Personnel

There are no designated campus security personnel with law enforcement authority or jurisdiction. Designated campus security personnel do not have the authority to make arrests. All complaints regarding criminal activities requiring law enforcement are directed to LVMPD, including the enforcement of state under-age drinking laws and federal and state drug laws.

### Written Agreements with Law Enforcement

There is no written memorandum of understanding between Northwest Career College and the Las Vegas Metropolitan Police Department for the investigation of alleged criminal offenses.

### Reporting Crimes to Law Enforcement

Designated security personnel are required to promptly and accurately report all crimes to the appropriate police agencies when the victim of a crime elects to, or is unable to, make such a report. The institution requires that designated security personnel respect the wishes of the victim if they decline to make a report or involve law enforcement authorities.

# Campus Safety Educational Programs

## Type and Frequency of Programs

Northwest Career College conducts educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking. The institution conducts a primary prevention and awareness program for all new incoming students and employees, as well as annual prevention and awareness campaigns for the campus.

The Northwest Career College primary prevention and awareness program is presented to all new students on the day of orientation and to all employees on the day they complete employment paperwork. The primary prevention and awareness program addresses security procedures and practices and encourages the campus community to look out for themselves and one another and is conducted regularly for new students and employees. The ongoing prevention and awareness campaigns cover similar topic material and are conducted annually for returning students and employees.

## Primary Prevention and Awareness Program

The primary prevention and awareness presentation includes the following information:

- A statement that Northwest Career College prohibits the crimes of dating violence, domestic violence, sexual assault and stalking;
- Definitions of the terms dating violence, domestic violence, sexual assault and stalking;
- The definition of consent in reference to sexual activity;
- A description of safe and positive options for bystander intervention;
- Information on risk reduction;
- Information on the institution's policies and programs to prevent dating violence, domestic violence, sexual assault, and stalking;
- Information on institutional procedures for disciplinary action in cases of alleged dating violence, domestic violence, sexual assault and stalking; and,
- Written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services available for victims, within the institution and in the community.

## Ongoing Prevention and Awareness Campaigns

Northwest Career College conducts annual, ongoing prevention and awareness campaigns in association with publishing its updated ASR in order to continue educating members of the campus community about the importance of these issues. Faculty members assist the Campus Security Authority by discussing personal security recommendations, ways to reduce risk for potential attacks, sexual assault prevention, and guidelines for effective bystander intervention as described in the primary prevention and awareness program.

## Personal Security Recommendations

Northwest Career College reserves the right to refuse access to anyone acting in a disorderly or disruptive fashion and to request that such persons leave the premises. Northwest Career College expects students and employees to take appropriate precautions to ensure their own safety and the safety of others. Students and employees are responsible for their own personal possessions. Staff or faculty members have been trained to report all known or suspected criminal activities to designated security personnel.



Northwest Career College recommends that students and employees take the following precautions to protect themselves and their property:

1. Immediately report suspicious people or activity you observe to designated security personnel, the Student Services department, or the nearest available employee if the first two options are unavailable
2. Tell an instructor or staff member if a stranger confronts you on campus or the adjacent property
3. When parking, lock your vehicle and remove valuables from plain view
4. Avoid carrying large amounts of cash or valuables
5. Don't leave purses, backpacks, computers, phones, or other personal items unattended
6. Write your name in several places on your textbooks
7. Lock up bicycles with high-quality locks
8. Walk in groups of at least two people at night
9. Lock your office when you leave
10. Always report all criminal incidents and losses of property

A summary of these recommendations are reviewed at new student orientations during the primary preventions and awareness presentation to encourage students to be responsible for their own security and the security of others and to assist the institution in the prevention of crimes on campus. This report may be accessed in the institutional disclosures section of the Northwest Career College website or a paper copy may be requested from the Financial Aid Department.

#### Risk Reduction and Crime Prevention Information

The institution firmly believes that no victim is ever to blame for being assaulted or abused. Unfortunately, a person who is the victim of sexual or dating violence is more likely to be re-victimized. If you are being abused or suspect that someone you know is being abused, speak up or intervene. Below are some tips to help reduce your risk, and how to avoid potential attacks.

- Get help by contacting the Student Services Department for support services.
- Learn how to look for "red flags" in relationships so you can learn to avoid some of those characteristics in future partners.
- Consider getting a protective order or stay away order.
- Learn more about what behaviors constitute dating and domestic violence, understand it is not your fault, and talk with friends and family members about ways you can be supported.
- Trust your instincts—if something doesn't feel right in a relationship, speak up or end it.

In order to help prevent sexual assault, students and employees are encouraged to use the practices below to help maintain your own safety and the safety of others. Although drug and alcohol consumption is prohibited on campus, the following practices are good to practice in any social situation.

- Be aware of rape drugs.
- Try not to leave your drink unattended.
- Only drink from un-opened containers or from drinks you have watched being made and poured.
- Avoid group drinks like punch bowls.

- Cover your drink. It is easy to slip in a small pill even while you are holding your drink. Hold a cup with your hand over the top, or choose drinks that are contained in a bottle and keep your thumb over the nozzle.
- If you feel extremely tired or drunk for no apparent reason, you may have been drugged. Find your friends and ask them to leave with you as soon as possible.
- If you suspect you have been drugged, go to a hospital and ask to be tested.
- Keep track of how many drinks you have had.
- Try to come and leave with a group of people you trust.
- Avoid giving out your personal information (phone number, where you live, etc.). If someone asks for your number, take his/her number instead of giving out yours.
- Make sure your cell phone is easily accessible and fully charged.
- Be familiar with where emergency phones are installed on the campus.
- Be aware of open buildings where you can use a phone.
- Keep some change accessible just in case you need to use a pay phone.
- Take major, public paths rather than less populated shortcuts.
- Avoid dimly lit places and talk to campus services if lights need to be installed in an area.

### Bystander Intervention Information

The institution encourages students and employees to be an intervener and stop these incidents before they occur, and to talk to their friends about it so that they will intervene as well. The campus security authority reviews the following steps for being an effective bystander during orientation:

- Notice the incident – Bystanders first must notice the incident taking place. Obviously, if they don't take note of the situation there is no reason to help.
- Interpret the incident as an emergency – Bystanders also need to evaluate the situation and determine whether it is an emergency—or at least one in which someone needs assistance. Again, if people do not interpret a situation as one in which someone needs assistance, then there is no need to provide help.
- Assume responsibility – Another decision bystanders make is whether they should assume responsibility for giving help. One repeated finding in research studies on helping is that a bystander is less likely to help if there are other bystanders present. When other bystanders are present, responsibility for helping is diffused. If a lone bystander is present, he or she is more likely to assume responsibility.
- Attempt to help, whether this is to help the people leave the situation, confront a behavior, diffuse a situation, or call for other support/security. The best way bystanders can assist in creating an empowering climate free of interpersonal violence is to diffuse the problem behaviors before they escalate. Educate yourself about interpersonal violence AND share this info with friends. Confront friends who make excuses for other people's abusive behavior. Speak up against racist, sexist, and homophobic jokes or remarks

Students and employees are given the following tips regarding how to successfully intervene in a situation potentially involving sexual assault, relationship violence, or stalking:

- Approach everyone as a friend;
- Do not be antagonistic;
- Avoid using violence;

- Be honest and direct whenever possible;
- Recruit help if necessary;
- Keep yourself safe; and,
- If things get out of hand or become too serious, contact the police.

### Educational Program 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 action to intervene.
- Ongoing prevention and awareness campaigns: 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 and including the information described in the paragraphs above.
- Primary prevention programs: programming, initiatives, and strategies informed by research and 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 a healthy and safe direction.
- 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.

## **Drug and Alcohol Abuse Prevention Policy**

### Policy Statement

Northwest Career College has a zero tolerance policy with regard to the possession, use, and sale of alcoholic beverages and illegal drugs. Northwest Career College reserves the right to dismiss any student from the school who violates this policy. Employees who violate this policy will be subject to disciplinary action, up to and including discharge.

Northwest Career College strives to remain in compliance with the requirements of the Drug-Free Schools and Communities Act. The institution has implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs both by students and employees both on its premises and as a part of any of the college's activities. The institution has a written policy on alcohol and other drugs and distributes information to students upon enrollment via the official School Catalog.

In recognition of the problems associated with drug and alcohol abuse in society today, Northwest Career College also provides the following information to all new employees upon hiring and new students upon enrollment.

Drug and Alcohol Disclosure

- 1) The unlawful possession, use, sale, or distribution of illicit drugs or alcohol on school property or in connection with any school activity is strictly prohibited. This prohibition applies to all students and employees.
- 2) Local/State – Sanctions for possession or distribution of illegal substance in the State of Nevada is a felony, punishable by imprisonment in the State Penitentiary for a minimum of one (1) year. Possession of alcohol, or distribution to any person under the age of twenty-one (21), is punishable by imprisonment for a minimum of six (6) months in a local jail.
- 3) Federal – Penalties for unlawful manufacturing, distribution, and dispensing of controlled substances are provided under the Federal Controlled Substances Act. The nature of the drug or other substance, the amount the drugs or other substance involved and the number of offense determine the penalties.

Examples of Federal Drug-Trafficking Penalties (Accessed from DEA Website on 8/28/17)

	<b>First Offense</b>	<b>Second Offense</b>
<b>Marijuana (1,000 Kg or more)</b>	No less than 10 yrs.	No less than 20 yrs.
<b>Heroin (1-999g)</b>	No less than 5 yrs.	No less than 10 yrs.
<b>Cocaine (500-4999g)</b>	No less than 5 yrs.	No less than 10 yrs.

- 4) There are various health risks associated with the use of illicit drugs and the abuse of alcohol. Some of the more common problems are cited below:

**Marijuana:** Use can lead to an increase in heart rate of up to 50%, a sense of euphoria, acute anxiety, and tremendous mood swings. There is potential for long term physical and psychological damage.

**Cocaine:** Use can affect the brain in seconds and result in heart or respiratory failure.

**Crack:** Use can lead to an intense high within seconds, deep depression, and intense dependency in a short time.

**Amphetamines:** Use increases heart and breathing rates, raises blood pressure while often causing blurred vision, dizziness, lack of sleep, or anxiety. Body chemistry is upset which can lead to long term physical problems.

**Alcohol:** Use can lead to feeling of confidence and control. Liver, brain, heart, and stomach destruction goes on even without apparent symptoms. Use for a long period of time often causes dependency and may be fatal.

- 5) There is help for our students and employees. Northwest Career College does not offer its own assistance program. However, the Student Advocate can provide additional information for a Confidential Referral Program.

- 6) Any student or employee who is a drug or alcohol offender will have disciplinary action imposed by the school. These sanctions may include one or more of the following:
- Mandated referral for the problem with our Confidential Referral Program.
  - Mandated attendance at a local treatment center.
  - Mandated completion of drug rehabilitation program.
  - Mandated probation period not to exceed one month.
  - Possible expulsion from school if a student or discharge from employment if an employee.
  - Possible referral for a local, state, or federal prosecution.

## **Sexual Assault Prevention Policy**

### Policy Statement and Awareness Promotion

The institution strictly prohibits the students and employees from participating in the crimes of dating violence, domestic violence, sexual assault, and stalking as those terms are defined for the purpose of the Clery Act. The definitions of these terms and the term, “consent,” in reference of sexual activity can be found in the Introduction and Purpose section of this report. The institution utilizes the primary prevention and awareness program and ongoing campaigns described under Campus Safety Educational Programs to promote awareness about these offenses and provide information on risk reduction to create a safe campus environment.

### Victim Rights Statement

When a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee a written explanation of the student's or employee's rights and options in accordance with the requirements of 34 CFR § 668.46(b).

### Victim Confidentiality

Northwest Career College will protect the confidentiality of victims of dating violence, domestic violence, sexual assault and stalking to the fullest extent of the law. The Student Services department will work with the student to ensure that the complainant's health, physical safety, work and academic status are protected, pending the outcome of a formal complaint. Additionally, personally identifiable information about the victim will be treated as confidential and only shared with persons with a specific need to know who are investigating/adjudicating the complaint or delivering resources or support services to the complainant.

Northwest Career College does not publish the name of a crime victim when completing publicly available recordkeeping, including Clery Act reporting disclosures. The institution will also maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality will not impair the ability of the institution to provide the accommodations or protective matters.

### Procedures Victims Should Follow if a Crime of Dating Violence, Domestic Violence, Sexual Assault, or Stalking Has Occurred

The first priority of a victim of sexual assault or domestic violence is to get to a place of safety, then to obtain necessary medical attention as soon as possible. Go to the nearest hospital, who will have a certified ER hospital staff member that is authorized to perform medical/legal examinations. An assault should be reported directly to the local police department.

Although Northwest Career College strongly advocates that a victim of dating violence, domestic violence, sexual assault or stalking report the incident to the Las Vegas Police Department in a timely manner, it is the victim's choice to make such a report and the victim has a right to decline involvement with the police. The Student Services department at Northwest Career College will assist any student who wishes to notify law enforcement authorities regarding any alleged crime, regardless of whether that crime occurred on or off campus. Students requiring such assistance should contact the Student Services department for guidance.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining orders of protection related to the incident more difficult. The designated security personnel or supplemental support personnel will provide written information to victims about the importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order. If a victim chooses not to make a complaint regarding an incident, he or she nevertheless should consider speaking with the Las Vegas Police Department or other law enforcement agency to preserve evidence in the event that the victim changes his or her mind at a later date.

Physical evidence is crucial in helping to prosecute assailants in cases of rape or sexual assault. Physical evidence must be collected in a timely manner by a certified medical facility. Prior to a medical/legal exam, victims of rape or assault should not bathe, change clothes, douche, use the toilet (if possible), smoke, or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that the evidence may be preserved. If victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted diseases.

Victims of violence should not bathe or change clothes prior to documentation of physical evidence. Preserving evidence may be necessary to prove criminal dating violence, domestic violence, stalking, or in obtaining a protection order. If victims do not opt for forensic evidence collection, health care providers can still treat injuries.

Victims of stalking should save evidence such as any letters, notes, e-mails, phone calls, videos, photos, texts, social media postings (i.e. Facebook, Twitter, etc.), computer screenshots, voicemails, or any other form of evidence that would be helpful.

#### Procedures for Reporting a Crime of Dating Violence, Domestic Violence, Sexual Assault, or Stalking That Has Occurred on the Northwest Career College Campus

When a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee with a written explanation of the student's or employee's rights and options.

If an alleged instance of dating violence, domestic violence, sexual assault, or stalking occurs within the institution's Clery geography, the following steps should be taken to report the crime:

1. The victim should locate the Campus Security Authority (CSA) or another designated security personnel to file an incident report regarding the alleged crime. If the CSA cannot be located, the victim should proceed to the Student Services Department for assistance.
2. The CSA or other school representative will have the victim fill out a report detailing all pertinent information regarding the offense and will provide written information to victims about the importance

of preserving evidence that may assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

3. The CSA or other school representative will then encourage the victim to report the alleged crime to the Las Vegas Metropolitan Police Department in a timely manner and will provide them with the contact information for victim advocates at LVMPD listed above. They will then provide the student or employee a written explanation of the student's or employee's rights and options at this time to:
  - Be assisted by campus authorities in notifying law enforcement authorities if the victim chooses
  - Decline to notify such authorities.
  - Obtain a protective order issued by the following courts:
    - o Protective Orders from Stalking and Harassment may be obtained from the Las Vegas Township Justice Court, located at 200 Lewis Avenue, 2nd floor, Las Vegas, NV 89155. The required forms and directions for completing them can be accessed at [http://www.lasvegasjusticecourt.us/forms/document\\_center/protective\\_order\\_harm\\_to\\_minors.php#revize\\_document\\_center\\_rz527](http://www.lasvegasjusticecourt.us/forms/document_center/protective_order_harm_to_minors.php#revize_document_center_rz527). The Court may be contacted at 702-671-3116 for additional information.
    - o Protective Orders from Domestic Violence may be obtained from the Eight Judicial District Court, located at 601 North Pecos Road, Ste. ADG-450, Las Vegas, Nevada 89101-2408. The required forms and directions for completing them can be accessed at <http://www.clarkcountycourts.us/departments/tpo/protective-orders/>. The Court may be contacted at 702-455-3400 for additional information.
4. The Campus Security Authority or other school representative will then make a copy of the document for the student, and place the original report in the Campus Crime Report file. This report will be retained permanently in this file.
5. The Campus Security Authority or other school representative will report the incident to the Chief Operating Officer.
6. The Chief Operating Officer will meet with the Director of the college to review the report and initiate disciplinary proceedings as detailed in the section below.

The victim is responsible for obtaining orders of protection, "no-contact" orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court. No such orders will be issued by the institution. However, the institution will assist in the enforcement of such orders while the victim is on campus, should those orders be issued by the proper authorities. The Student Services Department at Northwest Career College will assist any student who wishes to notify law enforcement authorities regarding any alleged crime, regardless of whether that crime occurred on or off campus. Students requiring assistance should contact the Student Services department for guidance.

The institution will provide written notification to victims about victim services available off-campus through LVMPD related to counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services. Victim advocates at LVMPD can be reached at (702) 828-2955 and can direct victims to the listed services. Additional information regarding victim services can be found online at <https://www.lvmpd.com/en-us/Pages/VictimServices.aspx>.

The institution will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. The institution is obligated to comply with a student's reasonable request for a living and/or academic situation change following an alleged sex offense. The institution will make reasonable accommodations and take protective measures whenever possible to assist in the continuation and completion of the victim's educational

program if the victim requests them and they are reasonably available, regardless of whether the victim chooses to report the crime to law enforcement. Determinations regarding accommodations are made by the Chief Operating Officer and School Director.

The institution will complete publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifying information about the victim, as defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)(20)), while maintaining privately the personal information needed for documentation of follow-up and resolution to the offense. The institution will also maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

#### Procedures for Institutional Disciplinary Action in Cases of Alleged Dating Violence, Domestic Violence, Sexual Assault, or Stalking

Disciplinary hearings shall provide a prompt, fair, and impartial process from the initial investigation to the final result. The proceedings will be conducted by the Campus Security Personnel listed above, officials who receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

Standard disciplinary proceedings will be used by the institution for all types and circumstances of allegations regarding dating violence, domestic violence, sexual assault and stalking. Disciplinary proceedings will occur as soon as possible, but never more than 5 business days from the date that the incident was reported.

A disciplinary hearing will be held by the School Director, the Chief Operating Officer, the Campus Security Authority, and at least one other school official who has received the required training on the issues related to dating violence, domestic violence, sexual assault, and stalking and how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

At this hearing, both the accuser and the accused will be given the opportunity to share details regarding the alleged crime. The facts of the case, the input of both parties, and any other available evidence will be evaluated by the board of school representatives and a determination will be made. Evidence can be submitted by both parties and will be evaluated by members of the hearing review board. Both parties will receive written notice of this determination as soon as possible, but no later than 3 business days following the culmination of the proceedings. The rights of the accuser and the accused during these proceedings are detailed below.

A disciplinary complaint can be filed with the Student Services department and will be reviewed by the designated security personnel who have received appropriate training on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

The institution will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph



## Standards of Evidence Disclosure

All evidence submitted to the members of the board is thoroughly reviewed to confirm its authenticity and affirm it has not been doctored or manipulated before the hearing. Proof beyond a reasonable doubt is the most demanding standard and the one that must be met for conviction in a hearing. This standard of evidence is utilized for all disciplinary proceedings arising from allegations of dating violence, domestic violence, sexual assault and stalking.

## Sanctions and Protective Measures

Possible sanctions that the institution may impose following the results of any institutional disciplinary proceedings for an allegation of dating violence, domestic violence, sexual assault and stalking can include issuing a verbal warning, issuing a written warning, placing an accused student on a professionalism probation, dismissal of an accused student from school, or termination of an accused employee.

The institution may offer a range of protective measures to a victim following an allegation of dating violence, domestic violence, sexual assault and stalking. These protective measures can range from allowing the student to switch classes or shifts of their program of study, up to and including enforcement of restraining orders and other legal orders of protection issued on behalf of the victim. Specific protective measures provided by the institution for any given student victim will be determined on a case-by-case basis during the course of the institutional disciplinary proceedings. These determinations will be made by a board of school representatives who have received training on the investigation process.

## Rights of the Accuser and the Accused

The accuser and the accused are entitled to a prompt, fair, and impartial proceeding from the initial investigation to the final result. Proceedings will be:

- Completed within reasonably prompt timeframes, including a process that allows for the extension of timeframes for good cause with written notice to the accuser and the accused of the delay and the reason for the delay;
- Conducted in a manner that:
  - o Is consistent with the institution's policies and transparent to the accuser and accused;
  - o Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
  - o Provides timely and equal access to the accuser, the accused, and appropriate officials to information that will be used during informal and formal disciplinary meetings and hearings (as permitted by state and federal laws);
- Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused; and,
- Conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

The accuser and the accused are entitled to the same opportunities to have others present during an institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by an advisor of their choice. The institution will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding.

Both the accuser and the accused shall be simultaneously informed, in writing, of:

- The outcome of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking;
- The institution's procedures for the accused and the victim to appeal the results of the institutional disciplinary proceeding;
- Any change to the results that occurs prior to the time that such results become final; and,
- When such results become final.

### Prevention Policy Definitions

- Advisor: any individual who provides the accuser or the accused support, guidance, or advice.
- Proceeding: all activities related to a non-criminal resolution of an institution disciplinary complaint, including, but not limited to, fact-finding investigations, formal or informal meetings, and hearings. Proceedings 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 an official or entity authorized to resolve disciplinary matters within the institution. The result must include any sanctions imposed by the institution. The result must also include the rationale for the result and the sanctions.

## **Information Regarding Registered Sex Offenders**

Law enforcement agency information provided by the State of Nevada concerning registered sex offenders can be found online at <http://www.nvsexoffenders.gov/sorstart.aspx>. In order to conduct a geographical search for registered sex offenders, you can visit <http://www.nvsexoffenders.gov/SearchOffender.aspx> and enter the applicable information. Please note, the information provided is intended for community safety purposes only and should not be used to threaten, intimidate, or harass anyone listed in this registry.

## **Procedures for Reporting Crimes**

### Policy Statement

The institution strongly encourages victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. The institution also strongly encourages victims or witnesses to report any of the crimes detailed in the ASR to the Las Vegas Police Department in a timely and accurate manner.

Criminal actions occurring on campus should be immediately reported by both students and employees to one of the designated security personnel (School Director, COO, Campus Security Authority, Director of Compliance) and/or local police. The Campus Security Authority maintains a log of all criminal activity reported in accordance with the Clery Act as well as the crime reports associated with any entries.

### Confidential Reporting Protocol

The institution respects the privacy of its students and faculty and designated security personnel maintain confidentiality with regard to the reporting of crimes that occur on campus whenever possible by ensuring verbal reports are made in private and asking that students submit written reports directly to them in a sealed envelope or via email.

Crimes reported confidentially are logged in the campus crime log in the same manner as other crimes. However, if a crime is reported confidentially and there was only one witness to the criminal activity, the institution will encourage the witness to release the institution to pursue appropriate sanctions in accordance with the student or employee Code of Conduct.

### Referral to Law Enforcement

Major offenses including but not limited to rape, domestic violence, dating violence, stalking, murder, aggravated assault, robbery, auto theft, etc. are reported to the Las Vegas Police Department and joint investigative efforts between the college and local agencies are initiated. The institution respects the victim's autonomy and authority to decline to report the incident to the police directly but will report any incidents to law enforcement that it feels may impact the security of the campus community such as those listed above.

The prosecution of all criminal offenses is conducted at the Municipal or Justice Courts levels. There is no written memorandum of understanding between Northwest Career College and the Las Vegas Metropolitan Police Department.

Victims or witnesses may decline to assist the institution and/or the police with their investigation prior to initiation or at any time prior to resolution. Victim or witness participation in the follow-up investigation is not required for the crime to be included in the annual disclosure of crime statistics.

## **Timely Warning Reports**

### Policy Statement

The institution reports to the campus community on crimes described in 34 CFR § 668.46(c) and the Crime Statistics section of the ASR which are reported to campus security authorities or local police agencies and deemed to represent a threat to the students and employees. The institution will report in a manner that is timely and that withholds as confidential the names and other identifying information of victims, as defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)(20)), and that will aid in the prevention of similar crimes. The Campus Security Authority will decide whether to issue a timely warning on a case-by-case basis based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts.

The institution is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor.

### Timely Warning Notification Content

Timely Warning Reports disseminated to the Northwest Career College campus population include a description of the crime, date and approximate time of occurrence, the location and a description of the suspect. Incident Resolution Emails disseminated to the Northwest Career College campus population include the same information as the Timely Warning Reports, as well as information on the resolution (if applicable).

### Timely Warning Notification Protocol

The manner of dissemination to alert the campus community may include one or more of the following methods: e-mail, voice mail, and text messages. Campus officials may also utilize the school website, campus bulletin boards, or its social media pages to post relevant warnings, updates and advisories. Campus officials may also decide to issue an alert about a crime occurring outside of the institution's Clery geography if it

determines such a notification to have value to the student and employee populations, although such a crime would not be included in the annual report.

If there is an immediate threat to the health or safety of students or employees occurring on campus, the institution follows its emergency notification procedures and is not required to issue a timely warning based on the same circumstances. The Campus Security Authority provides adequate follow-up information to the community as needed after resolution of the emergency.

## **Procedures for Reporting Life-Threatening Emergencies**

Any life-threatening emergency should be immediately reported by students or employees to local authorities by dialing 911. After activating the emergency response team, the student or employee reporting the emergency should then notify the designated security personnel, staff, and affected faculty if not already informed. If a criminal offense precipitated the life-threatening emergency, the institution will also issue a timely warning report and record the offense in the log of all criminal activity.

## **Emergency Response and Evacuation Procedures**

### Policy Statement

Northwest Career College will immediately notify students and employees upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus. The institution 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.

### Response to Emergency Reports

Northwest Career College responds to reports of emergencies and criminal actions as it deems appropriate under the circumstances. Northwest Career College may contact local law enforcement authorities, emergency medical services, local fire departments, or other outside agencies or entities.

In the case of a major offense, Northwest Career College will conduct an investigation after resolution of the emergency into any activities that occurred on campus by reviewing available video tapes and time clocks and speaking to staff and student witnesses to determine the facts of the offense and determine the institution's response to the crime. The institution will use the standard of "beyond a reasonable doubt" in determining whether or not disciplinary action is required under the Student Code of Conduct.

### Emergency Assessment Protocol

The Campus Security Authority is ultimately responsible for assessment of the situation, confirmation that there is a significant emergency or dangerous situation involving an immediate threat to students or employees, and determining appropriate actions in response to the emergency. If the Campus Security Authority is not present during an emergency, the first available designated security personnel will assume responsibility for emergency assessment. However, students and employees are encouraged to use appropriate discretion if they are the first person to encounter an emergency situation and should act accordingly.

Upon confirmation of the emergency situation, the Campus Security Authority will determine the appropriate segment or segments of the campus community to receive a notification as well as the appropriate the content of

the notification and then initiate the notification system described below. By default, all departments on campus and students will be notified of emergencies to ensure the safety and security of Northwest students, personnel, and members of the public. If the Campus Security Authority decides to limit the notification to specific segments of the campus community, there will be a continuing assessment of the situation and that additional segments of the campus community may be notified if a situation warrants such action.

The Campus Security Authority will determine how much information is appropriate to disseminate at different points in time and will delegate email notification regarding the emergency to the first available designated security personnel after specifying the contents of the initial notification. The Campus Security Authority will be then personally responsible for initiating in-person notifications throughout the campus facility with the assistance of supplemental support personnel. If the Campus Security Authority is not present at the time of the emergency, the first available designated security personnel will assume responsibility for coordinating the emergency response and initiating the notification system. In the event of an emergency or situation that will affect the community at large, the Campus Security Authority, COO or another designated employee will notify local authorities by calling 911.

If an immediate threat is not clearly evident, and it appears intervention will not escalate the situation, school officials may request that a perpetrator leave the building or take other appropriate action to diffuse the emergency situation.

### Emergency Notification Protocol

An Emergency Notification is a notification that is immediately circulated to the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus. Emergency Notifications are provided to the student and staff population in instances in which an actual emergency has occurred on campus or in an adjacent building.

Notifications are provided as soon as possible, while taking into account the safety of the student population and community and ensuring that any notification will not compromise the mitigation of the emergency. Examples of on-campus emergencies include: terrorist incidents, armed intruder(s), gas leak, or bomb threats. In the event of an actual emergency, students and employees will be notified in the following ways:

- The campus community at large will be notified by e-mail to prevent anyone off campus from becoming involved in the emergency. Students and staff are responsible for regularly checking their e-mail prior to coming to campus; and,
- Designated security personnel will personally visit each classroom, lab, and office; advise those present of the nature of the emergency; and instruct those present as to what action they should take. Possible actions may involve waiting for further information, moving to another part of the building, or evacuating the building.
  - o If designated security personnel are unable to reach a classroom, lab, or office due to the circumstances of the emergency, they will utilize the institution's phone system to contact the individual(s) and notify them of the emergency.
- Designated security personnel may designate a supplemental support employee to contact 911 in case of an emergency that requires dissemination of information to the larger community. The information needed for such a notification will be provided to the employee via the email alert. The Campus Security Authority will be responsible for ensuring notification to the larger community occurred properly upon completion of in-person notifications to the affected parties on campus.

Evacuation routes in the event of a fire or other emergency are posted within every room in the building. If an evacuation route is altered due to the emergency in question, this information will be communicated via email notification and the verbal announcements made in each classroom.

### Designated Security Personnel

The designated security personnel responsible for execution of the emergency response protocols described above are listed below:

- Campus Security Authority: Michael Kenny
- Chief Operating Officer: Patrick Kenny
- School Director: Dr. John Kenny
- Director of Regulatory Affairs: Dr. Thomas Kenny

### Procedure Review and Exercise Protocol

Emergency response and evacuation procedures are reviewed and table top exercises are conducted annually during scheduled staff and/or faculty meetings. These procedures are all discussed with employees during their employee orientation.

Emergency response and evacuation procedures are also evaluated using a minimum of one announced test evacuation each summer during school hours to practice coordination between campus security personnel for successful execution of a campus lockdown and campus evacuation. Unannounced tests may be conducted at any time at the discretion of the Campus Security Authority.

Students are interviewed by the designated security personnel after the test to obtain feedback about the effectiveness of the drill. They also receive reminders about the emergency response and evacuation procedures from employees and the Campus Security Authority prior to announced tests and are reminded about the availability of these procedures in hard copy via the ASR.

For each test, the Campus Security Authority is responsible for recording a description of the exercise, the date, the time the test started and ended, and whether it was announced or unannounced.

Evaluations and corrective action reports, which are designed for assessment and evaluation of emergency plans and capabilities, are completed after each test to ensure everyone involved in the emergency response and notification procedures understands his or her role and responsibility. The Campus Security Authority will assess whether the test met its goals or not and propose any necessary adjustments to improve subsequent tests.

## **Comparison of Timely Warnings and Emergency Notifications**

A timely warning is a notification with the intent of a warning regarding a criminal incident in a nearby area. Timely warnings are triggered by crimes that have already occurred but represent an ongoing threat. Warnings are provided to enable people to protect themselves and are issued as soon as the pertinent information is available. Timely warnings are distributed to the student and staff populations after a crime has occurred to inform members of the campus community of the crime that occurred and the resolution that was implemented (if resolved). They are circulated in order to aid in the prevention of similar crimes on or near the campus.

An Emergency Notification is a notification that is immediately circulated to the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus. Emergency Notifications are provided to the student and staff population in instances in which an actual emergency is occurring on campus or in an adjacent building. Notifications are provided as soon as possible, while taking into account the safety of the student

population and community and ensuring that any notification will not compromise the mitigation of the emergency. Examples include: a terrorist incident, an armed intruder, a gas leak, or a Bomb Threat.

### **Monitoring of Noncampus Criminal Activity**

The institution is required to monitor and record through local police agencies criminal activity by students at noncampus locations of student organizations officially recognized by the institution, including student organizations with noncampus housing facilities. However, there are no officially recognized student organizations with noncampus meeting locations, therefore there are no locations where crime is monitored or reported outside of the institution's designated Clery geography.

### **Missing Student Procedures**

The institution does not provide any on-campus student housing facilities and therefore does not maintain policies regarding missing student notifications.

### **Fire Safety Procedures**

The institution does not provide any on-campus student housing facilities and therefore does not maintain a fire safety log or fire safety statistics for such facilities or prepare an annual fire safety report.

### **FERPA Disclosure**

The institution's compliance with nationally implemented VAWA Regulations does not constitute a violation of FERPA nor compromises the privacy of students, staff or faculty.

### **Prohibition on Retaliation**

The Campus Security Authority, another employee, officer or agent of the institution, and the institution itself will not retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising their rights or responsibilities under any provision of this policy.

# Crime Statistics

## **Annual Disclosure of Crime Statistics**

### Method for Compilation of Crime Statistics

The Campus Security Authority maintains a log of all criminal activity reported on campus and is responsible for requesting additional information annually regarding statistics for crimes that occurred on or within the institution's Clery geography from the local police agency. The crime log is used in combination with police data to prepare the annual crime statistics listed in this report. These crime statistics are also published online using the United States Department of Education's Campus Safety and Security Data Analysis Cutting Tool

### Inspection Protocol

The institution will make the crime log for the most recent 60-day period open to public inspection during normal business hours. The institution will make any portion of the log older than 60 days available within two business days of a request for public inspection. Parties interested in reviewing the crime log should request to speak with the Campus Security Authority in order to fulfill the request.

## **Crime Recording Policies**

### Policy Statement

The institution includes in its crime statistics all criminal incidents and alleged criminal incidents listed in the various subsections of the Crime Statistics section of this report occurring on or within its Clery geography that are reported to a campus security authority for purposes of Clery Act reporting.

The institution records a crime statistic for the calendar year in which the crime was reported to local police agencies or to a campus security authority. The institution obtains additional information regarding statistics for crimes that occurred on or within the institution's Clery geography from the local police agency. The statistics of this section do not include the identification of the victim or the person accused of committing the crime in accordance with 34 CFR § 668.46(c).

### Crime Recording Protocol

Designated security personnel are required to make an entry or an addition to an entry to the log within two business days of the report of the information to the campus security department, unless that disclosure is prohibited by law or would:

- Jeopardize the confidentiality of the victim;
- Jeopardize an ongoing criminal investigation;
- Jeopardize the safety of an individual;
- Cause a suspect to flee or evade detection; or,
- Result in the destruction of evidence.

Designated security personnel are required to disclose any information withheld under these circumstances once the adverse effect described above is no longer likely to occur.



## Contents of Daily Crime Log

This log contains all relevant information needed to compile the crime statistics listed in this report, including:

- Name and contact information for victim or witness (to ensure all crimes are counted and to avoid double counting);
- Nature, date, time, and general location of the crime;
- Date and time the crime was reported; and,
- Disposition of the complaint.

All criminal incidents and alleged criminal incidents that are reported to a campus security authority occurring on or within the institution's Clery geography are recorded in the crime log, whether or not they are Clery Act crimes.

### Recording Multiple Offenses during a Single Incident

The UCR Hierarchy Rule does not apply to the crime log. If multiple Criminal Offenses are committed during a single incident, all of the offenses are recorded in the log. When counting criminal encounters in which more than one offense was committed during a single incident for crime statistics disclosure purposes, the institution adheres to the requirements of the Hierarchy Rule in the "Summary Reporting System (SRS) User Manual as found in 34 C.F.R. § 668 Subpart D Appendix A.

### Pastoral or Professional Counselor Protocol

The institution is not required to report statistics for crimes reported to a pastoral or professional counselor. However, pastoral counselors and professional counselors who contact the institution regarding a reported crime are encouraged, if and when they deem it appropriate, to inform the persons they are counseling of the procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics contained within this report.

## **Geography**

Crime statistics reported within this document include all crimes committed within the institution's Clery geography. The location categories used by the institution for the purpose of recording all crimes listed in this section (including stalking) are in accordance with 34 CFR § 668.46(c) and include:

- On-Campus (defined as in or on buildings and properties that are part of the institution's campus per 34 CFR § 668.46(a));
  - o The campus includes the following locations:
    - 7398 Smoke Ranch Road, Las Vegas, NV 89128; and,
    - 7375 Prairie Falcon Road, Suite #150, Las Vegas, NV 89128.
- Public Property (defined as immediately adjacent to and accessible from the institution per 34 CFR § 668.46(a)).

The institution does not maintain on-campus or off-campus residential facilities or dormitories or noncampus buildings or properties. Please note, the expansion of the Northwest Career College campus occurred effective August 1, 2017 and the crime statistics reported in this document are in reference to the 2016 calendar year. Therefore, these statistics are not inclusive of any data regarding 7375 Prairie Falcon Road, Suite #150. Statistics regarding this expanded Clery geography will be included in the 2018 Annual Security Report when the 2017 crime statistics are gathered.

## Criminal Offenses

The following tables contain data regarding criminal offenses occurring within the institution's Clery Geography for the three most recent calendar years in accordance with 34 CFR § 668.46(b). It also contains details regarding the location of such crimes and whether or not they were classified as a hate crime. If a primary crime listed in this subsection is classified as a hate crime, the institution identifies the category of bias that motivated the crime in the tables below. The categories of bias are listed in the Hate Crimes subsection.

The institution compiles the crime statistics for murder and non-negligent manslaughter, negligent manslaughter, rape, robbery, aggravated assault, burglary, motor vehicle theft, and arson using the definitions of those crimes from the "Summary Reporting System (SRS) User Manual" from the FBI's UCR Program as found in 34 C.F.R. § 668 Subpart D Appendix A.

The institution compiles the crime statistics for fondling, incest, and statutory rape using the definitions of those crimes from the "National Incident-Based Reporting System (NIBRS) User Manual" from the FBI's UCR Program as found in 34 C.F.R. § 668 Subpart D Appendix A.

### Criminal Offenses On Campus/Noncampus

<b>Criminal Offense</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Location?</b>	<b>Hate Crime?</b>
Murder/Non-negligent Manslaughter	0	0	0	N/A	N/A
Manslaughter by Negligence	0	0	0	N/A	N/A
Rape	0	0	0	N/A	N/A
Fondling	0	0	0	N/A	N/A
Incest	0	0	0	N/A	N/A
Statutory Rape	0	0	0	N/A	N/A
Robbery	0	0	0	N/A	N/A
Aggravated Assault	0	0	0	N/A	N/A
Burglary	0	0	0	N/A	N/A
Motor Vehicle Theft	0	0	0	N/A	N/A
Arson	0	0	0	N/A	N/A

### Criminal Offenses Public Property/Noncampus

<b>Criminal Offense</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Location?</b>	<b>Hate Crime?</b>
Murder/Non-negligent Manslaughter	0	0	0	N/A	N/A
Manslaughter by Negligence	0	0	0	N/A	N/A
Rape	0	0	0	N/A	N/A
Fondling	0	0	0	N/A	N/A
Incest	0	0	0	N/A	N/A
Statutory Rape	0	0	0	N/A	N/A

Robbery	0	0	0	N/A	N/A
Aggravated Assault	0	0	0	N/A	N/A
Burglary	0	0	0	N/A	N/A
Motor Vehicle Theft	0	0	0	N/A	N/A
Arson	0	0	0	N/A	N/A

If arson is committed, the institution records the arson in its statistics, regardless of whether or not it occurs in the same incident as another crime. If rape, fondling, incest, or statutory rape occurs in the same incident as a murder, the institution records both the sex offense and the murder in its statistics.

## Hate Crimes

The institution reports the number of each type of crime listed in the Primary Crimes sections that are determined to be hate crimes in accordance with 34 CFR § 668.46(b). The institution also reports on the number of each following hate crimes: larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property, as defined in the ‘Hate Crime Data Collection Guidelines and Training Manual’ from the FBI's UCR Program printed in 34 C.F.R. § 668 Subpart D Appendix A. If an offense listed in this subsection is classified as a hate crime, the institution identifies the category of bias that motivated the crime in the table below.

The categories of bias used by the institution for the purpose of classifying hate crimes are in accordance with 34 CFR § 668.46(c) and include the victim’s actual or perceived: race, gender, gender identity; religion; sexual orientation; ethnicity; national origin; or disability.

### Hate Crimes On Campus 2016

Criminal Offense	Category of Bias for Crimes Reported in 2016								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0

Hate Crimes On Campus 2015

Criminal Offense	Category of Bias for Crimes Reported in 2015								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0

Hate Crimes On Campus 2014

Criminal Offense	Category of Bias for Crimes Reported in 2014								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0

Hate Crimes Public Property/Noncampus 2016

Criminal Offense	Category of Bias for Crimes Reported in 2016								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0

Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0

Hate Crimes Public Property 2015

Criminal Offense	Category of Bias for Crimes Reported in 2015								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	0

Hate Crimes Public Property 2014

Criminal Offense	Category of Bias for Crimes Reported in 2014								
	Total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0

Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/Damage/ Vandalism of Property	0	0	0	0	0	0	0	0	0

## VAWA Offenses

The institution reports on several categories of Sex Offenses in the Primary Crimes section. The institution additionally reports on the following VAWA Offenses in accordance with 34 CFR § 668.46(b), including the number of each type of the following crimes that are determined to be hate crimes. If a sexual crime listed in this subsection is classified as a hate crime, the institution identifies the category of bias that motivated the crime in the table below. The categories of bias are listed in the Hate Crimes subsection.

The institution compiles the crime statistics for dating violence, domestic violence, and stalking using the definitions of those crimes found in 34 C.F.R. § 668.46(a).

### VAWA Offenses On Campus

Offense Type	2014	2015	2016	Location?	Hate Crime?
Domestic Violence	0	0	0	N/A	N/A
Dating Violence	0	0	0	N/A	N/A
Stalking	0	0	0	N/A	N/A

### VAWA Offenses Public Property/Noncampus

Offense Type	2014	2015	2016	Location?	Hate Crime?
Domestic Violence	0	0	0	N/A	N/A
Dating Violence	0	0	0	N/A	N/A
Stalking	0	0	0	N/A	N/A

When recording reports of stalking that include activities in more than one calendar year, the institution records a crime statistic for each and every year in which the course of conduct is reported to a local police agency or to a campus security authority. The institution records each report of stalking as occurring at only the first location within the institution's Clery geography in which the perpetrator engaged in the stalking course of conduct or the victim first became aware of the stalking.

## Arrests and Disciplinary Referrals

The following tables contain data regarding arrests or disciplinary referalls for law violations occurring within the institution's Clery Geography for the three most recent calendar years in accordance with 34 CFR § 668.46(b).

Arrests/Disciplinary Referrals On Campus

<b>Law Violation</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Arrests: Weapons: Carrying, Possession, etc.	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possession, etc.	0	0	0
Arrests: Drug Abuse Violations	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0
Arrests: Liquor Law Violations	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0

Arrests/Disciplinary Referrals Public Property/Noncampus

<b>Law Violation</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Arrests: Weapons: Carrying, Possession, etc.	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possession, etc.	0	0	0
Arrests: Drug Abuse Violations	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0
Arrests: Liquor Law Violations	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0

**Unfounded Crimes**

The institution generally does not withhold, or subsequently remove, a reported crime from its crime statistics based on a decision by a court, coroner, jury, prosecutor, or other similar noncampus official.

The institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation 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 “unfound” a crime report. 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.

The institution discloses the total number of crime reports that were “unfounded” and subsequently withheld in the table below in accordance with 34 CFR § 668.46(b):

Unfounded Crimes On Campus

<b>Unfounded Crimes</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Offense Type and Quantity Unfounded (per type)</b>
Total Unfounded Crimes	0	0	0	N/A

Unfounded Crimes Public Property/Noncampus

<b>Unfounded Crimes</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>Offense Type and Quantity Unfounded (per type)</b>
Total Unfounded Crimes	0	0	0	N/A