

# 2024 Annual Security Report/ Clery Act Campus Security Report & Federal Legal Disclosure Document

#### **PURPOSE**

This document is designed to provide you with information concerning your personal safety, to inform you of Colorado School of Healing Arts (CSHA) policies which help make the campus a safe place, and to comply with Federal law which requires CSHA to:

- Inform students and employees of CSHA's policies and programs that promote safety and security.
- Disclose campus crime data.
- Provide suggestions and information that will help minimize the likelihood of becoming a victim of crime whether on the campus or at your home
- Inform victims of sex-based discrimination and sexual violence of their rights.
- Notify individuals who report a crime of violence that they have options involving local law enforcement, if they would like support in contacting local law enforcement and that they may decline involving law enforcement.
- Publicize CSHA's drug and alcohol policies.
- Provide written information about victim services that are available.

# **INDEX**

PURPOSE	3
INDEX	4
YOUR SAFETY	6
Police Department Authority:	6
Campus Security Orientation:	6
EMERGENCY RESPONSE TEST LOG	
JEFFERSON COUNTY EMERGENCY PREPAREDNESS GUIDES	7
REGISTERED SEX OFFENDER LOOKUP	7
TO REPORT A CRIME	7
PERSONAL SAFETY TIPS	7
CLERY CAMPUS CRIME STATISTICS	
POLICY FOR PREPARING CAMPUS CRIME STATISTICS	12
CRIME DEFINITIONS	
CSHA Emergency Procedure Manual	14
Warning / Notification Basics	14
CSHA Emergency Procedure Manual excerpt continued:	15
To Activate the PA system	
Fire Alarm Pull Station Locations	
Evacuation Basics (Fire or Smoke)	15
CSHA Emergency Procedure Manual excerpt continued:	16
Gas Odor	16
Bomb Threat	
Basic Sheltering Procedures- Tornado/Severe Weather	16
Tornado/Severe Weather Watch Has Been Issued	16
Tornado Warning Has Been Issued or Tornado Has Been Spotted Near School or Severe	
Weather Siren Has Sounded	
CSHA Emergency Procedure Manual excerpt continued:	
Lock-Down Procedures	
Violence	
Unidentified Person in the Building	17
(without visitor pass or student ID)	17
If Person Refuses to Leave or Demonstrates Hostility Consider Them an Intruder	17
CSHA Emergency Procedure Manual excerpt continued:	18
Weapons	18
Suicidal Person on the School Campus	18
Suicidal person off campus	18
Serious Injury, Illness, Suicide Attempt	18
First Aid Supplies	
CSHA Emergency Procedure Manual Resources	19
CSHA PERSONAL SAFETY, ANTI-DISCRIMINATION/ANTI-HARASSMENT, TIT	
AND VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY HANDBOOK	
Personal Safety/Risk Reduction Procedures	
If You Sense a Potential Threat:	
Possible Situations That Could Indicate a Potential Threat:	20

Colorado School of Healing Arts

2024 Annual Security Report/Clery Act Campus Security Report & Federal Legal Disclosure Document P:\Campus Security\2024\2024 Clery Act Campus Security Report.docx

Walking Alone to School or on the School Campus/Parking Lot:	20
Safety in Your Car:	20
Safe Bystander Intervention:	21
Safe Environment Creation and Sex Offense Prevention:	21
What if my complaint is not Title IX, or VAWA related?	21
Sex Offense Prevention Information:	22
Timely Warning Notice Policy	22
Emergency Notifications Policy	22
Disclosure of Crime Statistics:	
What is Title IX? What is VAWA? In brief:	22
CSHA Title IX, Discrimination, Anti-Harassment Policy and Procedures	23
Forms of Harassment	
Sex-based Harassment (Title IX):	24
Hate Crimes:	24
Gender Identity, Gender Expression, or Sexual Orientation Discrimination:	25
Pregnancy – Related Discrimination:	25
CSHA Violence Against Women Act (VAWA) Policy	25
Summary Statement:	
Scope of Policy:	25
Prohibited Acts and Definitions:	25
Reporting Sexual Assault/Criminal Offense Policy and Procedures	26
Preserving Evidence:	26
Counseling:	27
Support:	27
Reporting VAWA, Title IX violations at CSHA:	27
Filing a Complaint for Title IX, VAWA, Discrimination, Harassment, Hate Crimes:	28
Time Line for Title IX, VAWA complaint process: (for complainant and respondent):	28
Investigation Process for a Title IX or VAWA complaint involving CSHA students:	28
Decision (Findings) and Response:	29
Appeals of investigation/hearing outcomes/decisions	29
Informal Resolution:	30
Dismissing of a Complaint:	30
Retaliation:	30
Confidentiality	30
Counseling:	31
Support:	31
Community Resources - Domestic Violence / Sexual Assault	31
24-Hour Domestic Violence, Crisis Lines, and Shelters	31
POLICY OF MAINTAINING A DRUG AND ALCOHOL FREE LEARNING	
ENVIRONMENT	32
DRUG AND ALCOHOL PREVENTION PROGRAM	32
VACCINATION POLICY	
COPYRIGHT INFRINGEMENT	
HIGH SCHOOL DIPLOMA VALIDATION	34
CAMDIIS MAD	3.5

# **YOUR SAFETY**

Colorado School of Healing Arts (CSHA) is a remarkable place to work and study. However, CSHA is not immune from social problems. CSHA's safety programs, though effective, are not a substitute for each of our responsibility to practice good safety and security habits. The school maintains a secure facility to the best of our ability and trains staff, faculty and students to be aware and report immediately any suspicious activity. CSHA has one building with a single public entrance. Students and staff are required to wear nametags upon entrance to the building. All other visitors are required to check in.

The intention of this publication is to provide members of the CSHA community with information that will help minimize the likelihood of becoming a victim of crime whether on the campus or at your home.

**Police Department Authority:** CSHA is located in Lakewood Colorado and is under the jurisdiction of the Lakewood Police Department.

Campus Security Orientation: All students are informed about campus security procedures and practices at the New Student Orientation.

### EMERGENCY RESPONSE TEST LOG

CSHA will test emergency response and evacuation procedures on an annual basis (if possible). This test may or may not be announced.

Description of Test	Date	Time	Announced/
_			Unannounced
Lock Down	9/20/10	13:30	Unannounced
Fire Drill	7/12/11	16:00	Unannounced
Fire Drill	9/12/12	10:00	Unannounced
Fire Drill	10/15/13	11:00	Unannounced
Fire Drill	8/19/14	18:00	Unannounced
Fire Drill	10/13/15	09:30	Unannounced
Fire Drill	9/19/16	09:30	Unannounced
Fire Drill	8/29/17	10:30	Unannounced
Fire Drill	8/29/18	10:00	Unannounced
Fire Drill	7/16/19	10:00	Unannounced
Fire Drill	None in 2020	None	(Pandemic)
Fire/Evacuation Review	9-14-21	3pm & 6pm	(Pandemic)
Fire Drill	9-27-22	1pm	Announced
Fire Drill (planned)	10-25-2023	2pm	Announced
Fire Drill (planned)	9-25-2024	9:35am & 5:30pm	Announced

#### JEFFERSON COUNTY EMERGENCY PREPAREDNESS GUIDES

Emergency Preparedness | Jefferson County, CO (jeffco.us)

#### REGISTERED SEX OFFENDER LOOKUP

CBI: Sex Offender Registry (colorado.gov)

#### TO REPORT A CRIME

#### **Emergencies – Call 911**

In addition, please report any 911 calls, suspicious activity or concerns to the following:

TITLE / NAME	PHONE #
School Director /VAWA Coordinator— Chris Smith Campus Security Authority (CSA)	303-986-2320 ext. 27
Director of Education/Student Advising - <b>Kris Will</b> Campus Security Authority (CSA)	303-329-6026 cell
Assistant Director/Title IX Coordinator – <b>Amy Chavez</b> Campus Security Authority (CSA)	303-986-2320 ext. 24
Dean of Students – <b>Cathy Lewis</b> Campus Security Authority (CSA)	303-986-2320 ext. 28
Your Instructor	Phone numbers given 1 <sup>st</sup> day of class

#### PERSONAL SAFETY TIPS

Personal safety is everyone's responsibility. Here are some tips that may reduce the possibility of becoming a victim:

- Remain alert and attentive to potential danger
- Don't put yourself at risk
- Report suspicious incidents to the police

Understanding the following information may help you deal with or avoid certain criminal events.

**Sexual Assault:** The Colorado School of Healing Arts policies require all of the CSHA community to respect the personal rights of others and to obey the law. Any violation of another individual's right to be free from forcible and non-forcible sex offenses constitutes a serious violation of school policies which may result in termination of employment, suspension, or dismissal from the school. All of the listed offenses are also crimes and punishable by imprisonment.

**Forcible sex offenses:** Offenses against another person forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity. These offenses include:

• **Sexual Assault:** Unwanted sexual acts directed against another person.

#### Personal Safety continued:

- Rape: The carnal knowledge (sexual intercourse) of a person against her or his will.
- Forcible Sodomy: Unwanted oral or anal sexual intercourse with another person.
- **Sexual Assault with an Object:** Use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person.
- **Forcible Fondling:** Unwanted touching of the private body parts of another person for the purpose of sexual gratification.
  - Non-forcible sex offenses: Unlawful, non-forcible sexual intercourse.
- **Incest:** Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape: Non-forcible sexual intercourse with a person who is under the statutory age of consent.

Frequently, victims and their attackers know each other. Be aware that acquaintance rape is a serious crime. Rape of any kind is a crime of violence and is never the victim's fault. The lack of verbal or physical resistance because of force, or threat of force, or intimidation, does not represent consent.

**Assaults:** Some tips to minimize circumstances that may increase vulnerability to assault:

- Never jog alone at night.
- Avoid dense shrubbery where an assailant could hide.
- Know the locations of emergency telephones.
- Stick to well-lighted paths and walkways at night.
- Carry both a cell phone and whistle / personal alarm to summon help.
- Let friends or family know where you are going and when you will return.
- Stay in groups.
- Keep windows and doors locked.
- Keep drapes or blinds closed when dressing

**Other Sex Offenses:** Sex offenses are not limited to rape and sexual assault. Other behaviors may be violations of CSHA policy or criminal law. Exhibitionists, voyeurs (peeping toms), and persons who make obscene or harassing phone calls are in violation of CSHA's policy and of the law. Although a physical attack may not have been carried out, do not take chances. Promptly report all incidents to the CSHA administration or staff.

- **Exhibitionism:** The act or practice of exposing one's genitalia to another for the purpose of obtaining sexual gratification or stimulation or to shock or be offensive to another.
- **Voyeurism:** The act or practice of obtaining sexual gratification or stimulation by visual means--an example would be a window peeper.

#### What to Do in the case of Exhibitionism/Voyeurism:

- Stay calm and exhibit no reaction.
- Contact the School Director, administration or facility personnel immediately.
- Note the time and location of the occurrence.
- Note physical characteristics of the offender.
- Note direction of travel.
- Get a description of the vehicle (make, model, color, and license plate number).
- Get the names and phone numbers of other witnesses.
- Lock all doors and windows.

Personal Safety continued:

**Harassing and Obscene Phone Calls:** Harassing and obscene phone calls are generally intended to shock or intimidate the victim or to sexually gratify the caller. Use the telephone on your terms—not the terms of the caller.

#### What to Do in the case of Harassing and Obscene Phone Calls:

- Do not give out your name. Note the phone number displayed on your caller ID.
- State- "Do not call this number again," and quietly hang up once a caller makes obscene remarks or does not respond to your "hello."
- Always contact CSHA administration to report these types of calls.
- Keep logs of calls noting date, time, content, voice characteristics, background noises, etc.
- Be wary of callers conducting surveys.
- Never give personal information to unknown callers (e.g. credit card or social security numbers, etc.)

**Active Shooter:** To survive an active shooter incident one must develop a *survival mindset* and a *course of action*. A survival mindset is a protective shield comprised of three components:

- Awareness
- Preparation
- Rehearsal

In the event of an Active Shooter, a course of action may involve any or all of the following:

- **Figure out** the situation.
- Get out to a safer area if you can.
- Call out to the police.
- **Hide out** if you are unable to get out.
- **Keep out** the shooter by blocking doorways, etc.
- Spread out (do not huddle together) and quietly develop a plan of action.
- **Take out** the shooter. Assume the shooter's intentions are lethal and be prepared to do whatever it takes (survival mindset) to neutralize the threat.

**Theft:** Theft is the most frequently reported crime. The best defense against theft is vigilance. Here are a few suggestions:

- Never leave personal belongings unattended, even for a minute.
- Keep doors and windows locked.
- Do not keep large amounts of money in your room or on your person.
- Do not lend your keys, credit cards, or CSHA ID to anyone.
- Do not attach ID to your keys.
- Engrave ID numbers on personal property (Do not use your Social Security number).
- Keep records of your property including description, make, model, and serial numbers.
- Always lock your car. Do not leave valuables inside.

Suspicious Packages or Letters and Possible Biological Materials: If You Receive a Suspicious Package or Envelope:

- Do not shake or empty the contents.
- Place the envelope or package in a plastic bag or container to prevent leakage of contents. If a container is not available, cover the envelope or package with (clothing, paper, trashcan, etc.) and do not remove this cover.
- Leave the room and close the door or section off the area to prevent others from entering.
- Immediately report the incident to the police.

#### Personal Safety continued:

#### If You Receive a Package or Envelope with a Powdery Substance:

- Do not clean up the powder. Cover the spilled contents with (clothing, paper, trashcan, etc.) and do not remove this cover.
- Leave the room and close the door or section off the area to prevent others from entering.
- Wash hands and exposed skin with soap and water to prevent spreading powder to your face.
- Immediately report the incident to the police.
- Remove contaminated clothing as soon as possible and place in a plastic bag, or other container. Give it to emergency responders.
- Shower with soap and water as soon as possible.
- Make a list of people that were in the area, especially those who had contact with the powder.

Anthrax organisms can cause infection in the skin, gastrointestinal system, or the lungs. To do so the organism must be rubbed into a cut or wound, swallowed, or inhaled as a fine powder or aerosolized mist. Disease can be prevented after exposure to the anthrax spores by early treatment with the appropriate antibiotics. Anthrax is not spread from one person to another person.

# How to Identify Suspicious Packages and Letters: Some characteristics of suspicious packages and letters include the following:

- Excessive postage
- Handwritten or poorly typed addresses
- Incorrect titles
- Title, but no name
- Misspellings of common words
- Oily stains, discolorations or odor
- No return address
- Excessive weight
- Lopsided or uneven envelope
- Protruding wires or aluminum foil
- Excessive security material such as masking tape, string, etc.
- Visual distractions
- Ticking sound
- Marked with restrictive endorsements, such as "Personal" or "Confidential"
- A city or state in the postmark that does not match the return address.

# **CLERY CAMPUS CRIME STATISTICS**

Note: The following statistics include those from Lakewood Police and CSHA for the contiguous areas of CSHA. See map on last

page for campus and public property.

page for campus and public property.			
Criminal Offense	2021	2022	2023
Criminal Offenses – On campus.			
Murder/Non-negligent manslaughter	0	0	0
Forcible sex offenses	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Negligent manslaughter	0	0	0
Criminal Offenses - Non-campus: CSHA does not have an	y Non-campus facilities	or campus residences.	
Criminal Offenses - Pub	lic Property		
Public property includes thoroughfares, streets, sidewalks and parking facilities			from the campus.
Murder/Non-negligent manslaughter	0	0	0
Forcible sex offenses	0	0	1
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	1	1
Aggravated assault	0	0	1
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Negligent manslaughter	0	0	0
Hate Offenses - On-campus &	Public Property		
Murder/Non-negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
All forcible sex offenses, including forcible rape	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Larceny-Theft	0	0	0
Negligent manslaughter	0	0	0
Intimidation	0	0	0
Simple assault	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0
Description During Co. Fundation of Froperty	V	U	<u> </u>

V	AWA Offenses – On Campus*		
	2021	2022	2023
Domestic violence	0	0	0
Dating violence	0	0	0
Stalking	0	0	0
V.	AWA Offenses – Off Campus*		
Domestic violence	0	0	0
Dating violence	0	0	0
Stalking	0	0	0
Arres	ts - On-campus & Public Property		
Liquor law violations	0	0	0
Drug law violations	0	0	0
Illegal weapons possessions	0	0	0
CSHA does not have	Arrests - Non-campus any Non-campus facilities or campus	residences.	
Disciplinary Actions/s	Judicial Referrals - On-campus & Pul	blic Property	
Liquor law violations	0	0	0
Drug law violations	0	0	0
Illegal weapons possessions	0	0	0
	Actions/Judicial Referrals - Non-came any Non-campus facilities or campus		
*The Violence Against	t Women Act (VAWA) data collection b	pegan in 2014	

**NOTE:** CSHA does not have any security personnel / campus police.

NOTE: CSHA does not have any campus housing.

#### POLICY FOR PREPARING CAMPUS CRIME STATISTICS

The previously stated statistics reflect offenses and arrests reported to Lakewood Police and/or CSHA, and are compiled in accordance with the definitions used in the Uniform Crime Reporting System of the Department of Justice, and the Federal Bureau of Investigation (FBI), as modified by the Hate Crime Statistics Act.

#### **CRIME DEFINITIONS**

Murder and Non-Negligent Manslaughter: The willful (non-negligent) killing of one human being by another.

**Negligent Manslaughter:** The killing of another person through gross negligence.

**Forcible Sex Offenses:** Forcible Sex Offenses – A forcible sex offense is any sexual act directed against another person, forcibly and/or against that person's will, or not forcibly or against the person's will, where the victim is incapable of giving consent. Examples of forcible sex offenses include:

**Forcible Rape:** The carnal knowledge of a person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her youth).

**Forcible Sodomy:** Oral or anal sexual intercourse with another person, forcibly and/or against that person's will; or not forcibly against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

#### CRIME DEFINITIONS continued:

**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, forcibly and/or against that person's will, or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

**Forcible fondling:** The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental incapacity.

**Non-forcible Sex Offenses:** A non-forcible sex offense is "unlawful, non-forcible sexual intercourse." Only two types of offenses are included in this definition:

**Incest:** Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Non-forcible sexual intercourse with a person who is under the statutory age of consent (18).

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

**Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm." (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)

**Burglary:** The unlawful entry of a structure to commit a felony or a theft. For reporting purposes, this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts at these offenses.

**Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned including joyriding.)

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

**Hate Crimes:** Any of the aforementioned offenses, and any other crime involving bodily injury, larceny-theft, simple assault, intimidation, and destruction, damage, or vandalism of property . . . that manifests evidence that the victim was intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability of the victim.

**Larceny-theft:** The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

**Simple Assault:** An unlawful physical attack by one person on another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

**Intimidation**: To unlawfully place another person in reasonable fear of bodily harm with threatening words and/or conduct, but without displaying a weapon or subjecting the victim to actual attack. Includes cyber-intimidation if victim is threatened on Clery geography.

**Destruction, damage or vandalism of property:** To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of the property.

#### CRIME DEFINITIONS continued:

Illegal Weapons Possession: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Include in this classification: the manufacture, sale, or possession of deadly weapons; carrying deadly weapons-concealed or openly; using, manufacturing, etc. of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit any of the above. The possession on campus of any firearm, wrist rocket or other deadly weapon is prohibited by university policy.

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

**Liquor Law Violations:** Violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages--not including driving under the influence and drunkenness. Included in this classification is: the manufacture, sale, transporting, furnishing, possessing, etc., of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; underage possession, using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and attempts to commit any of the above.

**Domestic Violence** is defined as any felony or misdemeanor crime committed by a current or former spouse of the victim; person the victim has a child with; an individual who cohabitates, or has lived with the victim as a spouse, or a person similarly situated to a spouse; and any other person committing an act against an adult or youth who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. **Dating Violence** is defined as violence committed by a person who has been in a social relationship of a romantic or intimate nature with the victim (based on the length and type of relationship and frequency of interaction).

**Stalking** is defined as engaging in conduct directed at a specific person that would cause a reasonable person to (a) fear for their safety or the safety of others; or (b) suffer substantial emotional distress.

# **CSHA Emergency Procedure Manual**

The following is excerpted from the CSHA Emergency Procedure Manual 10-1-2024 edition:

# **Warning / Notification Basics**

- Call 911
- Inform School Director at 303-986-2320, extension 27 or CTC.
- Warn students and staff. If an emergency requires immediate action to protect the safety of students and staff, activate PA Announcement. For fire/smoke- pull the fire alarm.
- School Director may email, text or post on Facebook to notify off- campus students and staff
- School Director or CTC notifies Executive Director/Owner.

CSHA Emergency Procedure Manual excerpt continued:

# To Activate the PA system

- Press "PAGE" button on any phone in the school, it will ask your page choice, press" BOTH" so that the announcement is made in classrooms AND hallways.
- There are phones located in the lab, clinic, front office, and all other offices.
- Possible announcements:
  - o "There is an emergency situation Please evacuate the building."
  - o "There is an emergency situation Please lock your doors and await an all clear."
  - o "There is an emergency situation Please go to an interior shelter area away from all doors and windows."

## **Fire Alarm Pull Station Locations**

1<sup>st</sup> Floor: <u>In hallway before the men's restroom</u>.

2<sup>nd</sup> Floor: <u>In hallway just past library entrance</u>.

3<sup>rd</sup> Floor: <u>In hallway before the restrooms.</u>

# **Evacuation Basics (Fire or Smoke)**

- Pull Fire Alarm and Call 911
- Direct students and staff to follow fire evacuation procedures and route.
- Instructors/Staff keep students/visitors/clients together.
- Follow alternate route if normal route is too dangerous. Note: If door is hot to touch do not open it.
- Do not attempt to retrieve personal belongings!
- Instructors/Staff should bring <a href="mailto:class/clinic/lab/visitor">class/clinic/lab/visitor</a>/ roster with you if possible and close doors behind you.
- Assist those individuals with special needs or that are handicapped.
- Use the stairs not the elevator.
- Once clear of building, contact the School Director.
- Meet at NE corner of the parking lot as far from building as possible, instructors take class attendance.
- No one may re-enter the building until determined safe to do so by police or fire authorities.
- Only speak with police/fire authorities if they initiate conversation (Do not distract them).

CSHA Emergency Procedure Manual excerpt continued:

#### Gas Odor

- Call 911
- Direct students and staff to follow fire evacuation procedures and route.

#### **Bomb Threat**

Upon Receiving a Message That a Bomb Has Been Planted in School:

- CTC notifies police (call 911) and notifies the School Director to send email or text message to all active students to say that the school is under a bomb threat.
- CTC orders evacuation of all persons inside school building(s) using PA system or and/or fire alarm.
- Follow the evacuation procedure in *Evacuation Basics Section*.
- No one may re-enter the building until determined safe to do so by police or fire authorities.

# **Basic Sheltering Procedures-Tornado/Severe Weather**

Shelter/Safe areas are rooms or interior hallways with no windows; i.e. bathrooms, hallways, interior rooms and interior office spaces.

Identify safe area(s) on each floor.

- Director or CTC directs students and staff to assemble in safe areas.
- PA announcement may be made. Email, text message and/or Facebook may be sent or posted.
- Require all students/staff to come inside the building and stay away from windows.
- Close all exterior doors.
- Instructors/Staff should bring <u>class /clinic/lab/visitor/room-rental</u> roster with them to the safe area if possible.
- Instructors/Staff should stay with and account for all students/clients/visitors after arriving in safe area.
- All persons must remain in safe areas until notified by Director, CTC, or emergency responders.

# Tornado/Severe Weather Watch Has Been Issued

- This indicates that conditions are favorable for tornado/severe weather.
- Monitor Emergency Alert Stations or NOAA Weather Stations (National Weather Service, Weather Channel).
- Bring and keep all school persons inside building.
- Identify shelter areas; be prepared to move to safe areas at a moments notice and follow the basic sheltering procedures.

# Tornado <u>Warning</u> Has Been Issued or Tornado Has Been Spotted Near School or Severe Weather Siren Has Sounded

- Move students and staff to safe areas.
- Remind teachers to take class rosters.
- Account for all students.
- Follow all basic sheltering procedures listed above.
- Remain in safe area until warning expires or until emergency personnel/CTC has issued an all-clear signal.

CSHA Emergency Procedure Manual excerpt continued:

#### **Lock-Down Procedures**

- Director or CTC will issue lock-down procedures by announcing warning over PA system and/or sending a messenger to each classroom.
- PA announcement: "There is an emergency situation please stay in classroom or treatment room, lock the door and remain in location until the all clear is given."
- An email, text message or Facebook post may be issued to warn students that the school is on lock down.
- Main Lobby Door remains Unlocked at all times.
- Lock security doors on each floor if possible and always lock classroom doors. \*Close blinds on all windows in your area.
- Move all persons away from windows and doors.
- Allow no one outside of classrooms until all-clear signal is given by CTC.

#### Violence

- Ensure the safety of students and staff first.
- Call 911 and then notify the School Director(s).
- School Director may email, post text or Facebook message if needed.
- Notify CPR/First Aid Certified persons in school of medical emergencies, if necessary. All Faculty and Lab personnel are CPR/First Aid certified.
- Keep students and nonessential staff away from the area.
- Implement Lock-Down or evacuation procedures as necessary.

# **Unidentified Person in the Building** (without visitor pass or student ID)

- Ask another staff person to accompany you before approaching stranger, if warranted.
- Greet stranger and identify yourself.
- Ask person the purpose of his/her visit without using leading information. (i.e. "May I help you find something?" not "Are you here for the ?"
- Inform person that all visitors must register at the front office or if after hours at the lab/clinic desk on the 1<sup>st</sup> or 2<sup>nd</sup> floor.
- If person's purpose is not legitimate, ask him/her to leave. Accompany them to the closest exit.
- If person asks to speak with a student or client, <u>do not identify that the student/client is here</u>. Ask visitor for name and phone # and request that they wait outside the building (as we are a private school). Let them know: "I will attempt to locate the person you are looking for and <u>IF</u> it turns out there is someone in the building by that name, I will give them the message and they may call you".

# If Person Refuses to Leave or Demonstrates Hostility Consider Them an Intruder

- Call 911 and School Director / CTC if intruder refuses to leave.
- Give police full description of intruder.
- Be aware of intruder's actions at this time (where he/she is located in school, whether he/she is carrying weapon or package, etc).
- CTC notifies School Director and may issue lock-down procedures or evacuation.
- An email, text or Facebook message may be sent if needed.

## Weapons

- If instructor suspects that a weapon is in classroom, he/she should confidentially notify a neighboring instructor. Instructor should then return and remain in the classroom.
- Neighboring instructor should call 911 follow their directions; notify the Directors once safety is ensured.
- Lock-down or evacuation procedures may be issued.
- Email, Facebook or text message may be posted or sent.

# **Suicidal Person on the School Campus**

- Confirm information.
- Call 911.
- Notify Directors and CTC.
- Meet with suicidal person privately if possible.
- Stay with person until suicide intervention arrives.
- Do not leave suicidal person alone.
- Ask the person, you suspect may be suicidal, the following questions:
  - o Are you feeling suicidal?
  - o What are your plans for suicide?
  - o Do you have the means with you to do so?
- Safeguard other students/staff as needed. Lock-down or evacuation may be necessary.

#### Suicidal person off campus

- If staff, faculty or students are contacted (phone, email, text) by a student who is off campus who indicates they are suicidal, we should immediately contact 911 with that person's contact information and ask for a wellness check.
- Directory information (name, address, and phone) is o.k. to give out about a student in an emergency all information to save someone's life may be shared.
- Contact School Director.
- Resume normal class routines as soon as possible.

# Serious Injury, Illness, Suicide Attempt

- Call 911
- Notify CPR/First Aid Certified persons in school building of medical emergencies. (All faculty and lab personnel are CPR/First Aid certified).
- Contact CTC and Directors.
- Keep all students and non-essential staff from the area.
- Stay with the injured person until help arrives.
- Cooperate with emergency personnel.

# First Aid Supplies

- <u>First Aid Kits</u> (with band aids) are located: 3<sup>rd</sup> Floor =clinic waiting room below rolling cart, 2<sup>nd</sup> Floor Kitchen on window wall and 2<sup>nd</sup> Floor Lab/Library desk.
- <u>CPR masks</u>: With First Aid kits in Clinic and Kitchen locations. 3<sup>rd</sup> floor has a hand pump mask (video on use in clinic library) and the 2<sup>nd</sup> floor Kitchen first aid kit has a mask.
- <u>Isolation Kit</u> For use in cleaning up and disposing spilled blood located with First Aid Kit on 3<sup>rd</sup> floor (Clinic).
- Gloves Located in Library desk drawer and Clinic desk drawer.

# **CSHA Emergency Procedure Manual Resources**

# EMERGENCY CALLS: DIAL 911

POLICE Lakewood (non-emergency/mainline/phone tree/police report 303-987-7111	d and Community Demonstrator (Dalling
Lakewood (non-emergency/24 hr/dispatch) 303-980-7300 https://www.lakewood	
FIRE West Metro Fire/Lakewood (Administration)	
https://westmetrofire.colorado.gov/	
HOSPITALS / HEALTH CARE Common Spirit - Saint Anthony's Hospital	
Intermountain Health Lutheran Medical Center (Hospital)	
Little Clinic at King Soopers	
Hazardous Materials/Colorado State Patrol	
COUNSELING/SUPPORT  Jefferson Center for Mental Health (24/7 emergency and walk in)	1-844-493-8255 Text TALK to 38255
988 Suicide and Crisis Hotline	QI+, Individuals with Neurodivergence, Native
VICTIM ASSISTANCE Center for Trauma and Resilience 24-hour Hotline	
The Blue Bench - Sexual Assault 24/7 Hotline	303-322-7273 a Violencia Sexual: 303-329-0031
https://thebluebench.org	
Lakewood Police Victim Services	303-987-7191
ALCOHOL AND DRUG ABUSE COUNSELING  Jefferson Center	303-425-0300
DOMESTIC VIOLENCE SHELTERS & COUNSELING National Domestic Violence Hotline https://www.thehotline.org	
Colorado Crisis Services	844-493-8255 or Text "TALK" 38255

End of excerpt from the CSHA Emergency Procedure Manual October 1, 2024 edition.

https://coloradocrisisservices.org

#### The following is the entire contents of the:

# CSHA PERSONAL SAFETY, ANTI-DISCRIMINATION/ANTI-HARASSMENT, TITLE IX AND VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY HANDBOOK

August 1, 2024 edition

# Personal Safety/Risk Reduction Procedures

Important: In the event of suspicious or criminal activity, get to a safe place and promptly call 911!

Personal safety and property security at CSHA is everyone's responsibility. The school urges all members of the community to participate in making the community as safe as possible. Please wear your nametag. When members of the community develop sensible security habits, they can assist the school in safeguarding personal safety, personal property and school property. Please check the bulletin board on the 2nd floor for information on personal safety and Violence Against Women Act (VAWA).

#### If You Sense a Potential Threat:

- Assess the situation and then take action. You will have to decide how immediate the threat is and how decisive your action should be.
- Move away from the potential threat. Join a group of (safe) people nearby.
- Go to a well-lit public place and call 911.
- If you believe the threat is imminent, yell, scream, or make a commotion any way you can. If your keyfob has a panic button, please use that as well.
- After you have avoided a potential threat, call 911.

#### Possible Situations That Could Indicate a Potential Threat:

- Unusual noises, such as gunshots, screaming and/or anything suggestive of foul play, danger or illegal activity. Get to a safe location and call 911 immediately.
- Open or broken doors/windows, which could signify a possible burglary in progress or the scene of a completed crime.
- Person(s) sitting in a parked car for an extended time.
- A vehicle driving slowly in the parking lot at night with its lights off.

#### Walking Alone to School or on the School Campus/Parking Lot:

- Walk purposefully, briskly, and keep moving. Stay alert to surroundings and trust your instincts.
- Avoid traveling the same route every day.
- Be mindful of your environment; limit phone viewing while walking.
- Have keys ready when approaching a locked door.
- If dropped off by a friend or taxi, ask the driver to wait until safely inside.
- Arrange a buddy system with someone you know to walk to and from the building.

#### Safety in Your Car:

- Have the car keys ready when approaching a vehicle and check to make sure no one is hiding inside. Lock your doors immediately, once inside the car.
- Park in a well-lit designated parking area.
- Keep all valuables, backpacks and book bags out of sight in the trunk of the vehicle.
- ALWAYS LOCK YOUR CAR!

#### Safe Bystander Intervention:

Take action only if you feel that it is safe to do based on the situation. Choose the best method to intervene based on the circumstances, including your own personal safety:

- Intervene directly. By intervening in the moment, bystanders may give the concerned person a chance to get to a safe place or leave a situation. Distract either party.
- Bring in someone else to help.
- Check in later.
- If you see someone else in imminent trouble, go to a safe location and call 911.

# **Safe Environment Creation and Sex Offense Prevention:**

CSHA is dedicated to creating a culture of safety and care as is required for Massage Therapy learning. This culture requires an understanding and ability to consistently demonstrate safety and care and is based on the CSHA Code of Ethics, the CSHA Code of Conduct and the CSHA Education Objectives and Massage Industry Standards (see all in the CSHA Catalog).

Because Massage Therapy training requires a level of care, respect, and ability to create safety above and beyond the absence of harassment/discrimination as outlined in this document, the school reserves the right to dismiss the student for inability to create safety and/or adhere to the CSHA Code of Conduct, CSHA Code of Ethics, and CSHA Educational Objectives and Massage Industry Standards.

# What if my complaint is not Title IX, or VAWA related?

If your concern is not a Title IX, VAWA or Discrimination complaint, please refer to the Complaint Procedure in the School's Catalog or the Employee Handbook.

- Student grievances or Employee grievances
  - Student/Teacher or Student/Staff or Student/Student misunderstandings -see Student Policy and Procedures within the School's Catalog Handbook.
    - If the student's concern relates to a potential misunderstanding, it is the hope that both parties commit to immediate communication with the intent of resolution. If the student remains unsatisfied, the student or employee may provide a verbal or written complaint to the Education Department. The Education Department will review the complaint, talk to the relevant parties and provide a response. If still unsatisfied, a student may direct the complaint to the School Director.
  - Employee/Employee or Employee/Administration or Employee/Student misunderstandings. See employee handout.
    - If the employee's concern relates to a potential misunderstanding, it is the hope that both parties commit to immediate communication with the intent of resolution. If the employee remains unsatisfied, the employee may provide a verbal or written complaint to the School Director. The Director will review the complaint, talk to the relevant parties and provide a response.

#### **Sex Offense Prevention Information:**

The Colorado School of Healing Arts is dedicated to creating a safe environment for all members of the CSHA community. To assist in this goal, CSHA dedicates a bulletin board on the second floor as the Sex Offense Prevention and Safety board with on-going campaigns and information.

CSHA discusses sexual assault prevention and safety issues specific to the massage therapy community throughout the classes in our Massage Therapy Program.

Please also see the Community Resources page in this document.

All Students are informed about campus security procedures and practices at the New Student Orientation.

# **Timely Warning Notice Policy**

In the event that the school is informed about a crime through local law enforcement that poses a **serious or ongoing** threat for the campus community within the campus or immediate surrounding area (Clery geography), CSHA will make every effort to issue a campus wide **timely warning** The warning will be issued over the school PA system, by direct contact, by phone, by the CSHA Text Notification System, and/or by email.

# **Emergency Notifications Policy**

When there is confirmation of an **immediate** (on campus) threat to the health and safety of the campus community in the judgement of the Administration, CSHA will (make every effort) to issue an **emergency notification** to our students and employees over the school PA system and/or through direct contact and/or CSHA Group Text Notification System and/or by email and/or phone and/or local or social media. This notification will provide information on the nature of the emergency, what changes one needs to make as a result. Evacuation procedures if necessary and assurance that an all-clear will be sent when the emergency is over (if applicable). For weather related notices, the warning will be issued by direct contact, by local or social media, and/or the CSHA Text Notification System.

#### **Disclosure of Crime Statistics:**

A crime is reported when it is brought to the attention of a school authority (any official who has the authority to institute corrective measures) or the local police by a victim, witness, third party or even the offender. Disclosure of crime reports must occur regardless of whether any of the individuals involved either in the crime itself, or in the reporting of the crime are associated with the institution. Alleged criminal incidents will be reported even if no investigation by the police or school authority occurs that could result in a finding of guilt or responsibility.

Please refer to the school's website for the Annual Security Report https://www.csha.net

# What is Title IX? What is VAWA? In brief:

**Title IX of the Education Amendments of 1972** is codified into law in 20 U.S.C. § 1681 and 30 C.F.R. Part 106. This law prohibits Sex-Based Discrimination and is comprised of

- Quid Pro Quo Harassment
- Clery/VAWA Crimes (Sexual Assault, Stalking, Dating Violence, and Domestic Violence), and
- Hostile Environment Harassment unwelcome sex based conduct that, based on the totality of the circumstances is subjectively and objectively offensive and is so severe <u>or</u> pervasive that it limits or denies a person's ability to participate in or benefit from the education program.

The Violence Against Women Reauthorization Act of 2013 (VAWA) requires the School to provide a prompt and equitable procedure for resolving complaints of

- sexual violence,
- dating violence,
- domestic violence and
- stalking.

# CSHA Title IX, Discrimination, Anti-Harassment Policy and Procedures

It is the policy of the Colorado School of Healing Arts (CSHA) to maintain a learning environment that is free from discrimination or harassment because of an individual's race, sex, gender, sexual orientation, gender identity, gender expression, religion, age, color, creed, national or ethnic origin, physical, mental, or sensory disability, marital status, genetic information, and/or status as an honorably discharged veteran or member of the military.

CSHA will promptly investigate all complaints, verbal or written, of harassment, sex-based harassment, sex-based discrimination or sexual misconduct/violence, take appropriate action to protect individuals from further harassment, and, if it determines that unlawful harassment occurred, appropriately discipline any student, teacher, administrator or other school personnel who is found to have violated this policy, and/or to take other appropriate action reasonably calculated to end the harassment.

CSHA is committed to support survivors of sexual misconduct, without sacrificing important safeguards to ensure a fair and transparent process and to providing a prompt, effective and unbiased resolution of allegations of discrimination and harassment. The Title IX Complaint policies are to be used for complaints of discrimination on the basis of sex as required by Title IX of the Education Amendments of 1972 (34 C.F.R. 106.8(b)).

Disability and Age Discrimination: These procedures are also to be used for complaints of discrimination on the basis of disability filed under Section 504 of the Rehabilitation Act of 1973 (34 C.F.R. 104.7(b)), and on the basis of age filed under the Age Discrimination Act of 1975 (C.F.R. 110.25(b)).

As a member of the school community, you have the right to file complaints of discrimination and harassment. Complaint investigations will be conducted in a respectful, transparent and unbiased manner consistent with CSHA policies and procedures. All members of the CSHA community are expected to comply with the terms and conditions of this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Disciplinary action, up to and including dismissal from the school with no opportunity for re-admission, will be taken against any student who is determined to be in violation of this policy.

#### Forms of Harassment

Forms of harassment may include but are not limited to:

- Verbal: sexual innuendos, racial or sexual epithets, slurs, off-color jokes, propositions, threats or suggestive/insulting sounds.
- Non-Verbal: derogatory cartoons or drawings, suggestive photos, pictures, objects or gestures
- Physical: any unwanted physical contact (including touching outside the context of a supervised massage school setting), physical interference or assault
- Other: making threats or reprisals of any kind for any reason

What to do if you believe you have been a victim of harassment or discrimination:

- Do not remain silent. *Tell the harasser that you find their conduct offensive and unwelcome and that you want the conduct to stop immediately.*
- You may find it helpful to keep a log of all incidents detailing the date, time, place and all individuals involved including any witnesses to the incident.

Harassment of any type will not be tolerated. If a student or employee becomes aware of any behavior that may constitute harassment, it is the responsibility of that person to report such conduct:

- Students should notify the Assistant Director/Title IX Coordinator (Amy Chavez), or the Dean of Students (Cathy Lewis), or the Director of Education (Kris Will), the Director/VAWA Coordinator (Chris Smith).
- Employees should notify the Assistant Director/Title IX Coordinator, Amy Chavez.

# Sex-based Harassment (Title IX):

Sex-based harassment does not refer to behavior or occasional compliments of a socially acceptable nature. Sex-based harassment refers to a behavior that is unwelcome, whether those involved are in a subordinate-supervisory relationship, faculty-student relationship, employee-student relationship, student-student relationship or employee-employee relationship. Sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

- Unwelcome conduct: unwelcome sex based conduct is conduct that based on the totality of the circumstances is subjectively and objectively offensive and is so severe <u>or</u> pervasive that it limits or denies a person's ability to participate in or benefit from the education program or work place.
- Quid Pro Quo: An employee threatens or suggests, either directly or indirectly, that a student's refusal to submit to sexual advances will adversely affect the student's grades, progress, evaluations, advancement or any other aspect of academics.
- Sexual Assault: Sexual violence and physical assault of a sexual nature. See Reporting Sexual Assault / Crimes Policies and Procedures in this document. See also sexual assault definition under VAWA section.

Sex-based discrimination includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

Examples of conduct which may constitutes sex-based harassment include but are not limited to:

- 1. Unwanted, offensive, and/or uninvited comments about another's physical appearance, sexual characteristics, gender identity, gender expression, sexual orientation, and/or pregnancy or related conditions.
- 2. Sexual advances.
- 3. Graffiti or displays of images of a sexual nature.
- 4. Sexual or "dirty" jokes. Sexual gestures.
- 5. Persistent attempts to change a professional relationship into an amorous relationship.
- 6. Touching one's own self sexually or talking about one's sexual activity in front of others.
- 7. Spreading rumors about or rating others as to sexual activity or performance.
- 8. Other unwelcome sexual behavior or words, including demands for sexual favors, when accompanied by implied or overt threats concerning an individual's educational or work status or implied or overt promises of preferential treatment.
- 9. Videotaping or photographing someone without their consent.
- 10. Unwelcome, unnecessary, sexually motivated or inappropriate patting, pinching or physical contact whether the person is of the same sex or the opposite sex.
- 11. This prohibition does not preclude legitimate, non-sexual physical conduct such as the use of necessary restraints to avoid physical harm to persons or property, or conduct such as a consoling hug or demonstration of massage techniques, correction of body mechanics and massage exchanges.

Sex-based harassment examples continued:

- 12. Physical assault; Coercing, forcing or attempting to coerce or force sexual intercourse or a sexual act on another. (See Sexual Assault section below).
- 13. Acts of voyeurism or deliberate attempts to invade another's privacy.
- 14. Any of the above carried out via internet, social media or other forms of correspondence.

**Note:** Students, teachers, faculty, and others should enjoy free speech and academic freedom protections even when speech or expression is *accidentally* offensive. As a massage school, we understand that creating professional therapeutic relationships, with trust and safety is a learned skill and intention that requires a larger commitment to caring, gentle, non-offensive speech, interactions and behaviors.

#### **Hate Crimes:**

Hate crimes are defined as a bias, bullying, harassment, verbal abuse or violent act that occurs when a perpetrator targets a victim because of membership or affiliation in a certain group. Such groups may include, but are not limited to ethnicity, gender identity, gender expression, nationality, physical, mental or

sensory disability, religion, sexual orientation and/or status as a veteran or member of the military. While discrimination based on these factors may be distinguished from sexual harassment, this type of conduct may contribute to the creation of a hostile work or academic environment.

# Gender Identity, Gender Expression, or Sexual Orientation Discrimination:

Harassment that is based on gender, gender identity, gender expression, sex or gender stereotyping, sexual characteristics or sexual orientation is prohibited. This type of discrimination may contribute to the creation of a hostile work or academic environment.

# **Pregnancy – Related Discrimination:**

Discrimination based on pregnancy, childbirth, termination of pregnancy, lactation or medication conditions of recovery related to these conditions is prohibited. If a student discloses a pregnancy or related condition to an employee, the employee must provide the student with the Title IX coordinator's contact information and/or Dean of Students contact information so that the student can coordinate reasonable modifications to preserve their equal access to CSHA's education program. (Reasonable modifications are those that do not fundamentally alter the nature of the education program.) Students with pregnancy-related conditions have the right to access voluntary leaves of absence with the student reinstated to the academic status they held before the leave began. Students also have the right to access a lactation space which (cannot be a bathroom and must be clean, shielded from view and free from intrusion by others. Similar rights are provided to employees.

# **CSHA Violence Against Women Act (VAWA) Policy**

# **Summary Statement:**

Everyone at the Colorado School of Healing Arts has the right to feel respected and safe. Colorado School of Healing Arts wishes to provide a school environment that is safe, conducive to learning and free from violence, harassment, exploitation, or intimidation.

CSHA prohibits sexual violence. Such behavior violates both the law and the CSHA Student and Employee Code of Conduct. The school will respond promptly and efficiently to reports of sexual violence and will take appropriate action to prevent, to correct, and when necessary, discipline behavior that constitutes sexual violence, or otherwise violates the Violence Against Women Act (herein referred to as the "VAWA Policy").

#### CSHA Violence Against Women Act (VAWA) policy continued:

This policy in its entirety, provides a written explanation of available rights and options, including procedures to follow, when the school receives a report that a student or employee has been a victim of sexual assault/violence, domestic violence, dating violence, or stalking, whether the offense occurred on or off the school property or in connection with any school sponsored event.

# **Scope of Policy:**

This VAWA policy applies to all CSHA students and employees.

#### **Prohibited Acts and Definitions:**

In compliance with the Violence Against Women Act (VAWA), the VAWA Policy prohibits sexual violence, domestic violence, dating violence, stalking as defined below:

- **Sexual Violence** is defined as physical, sexual acts without the consent of the other person or when the other person is unable to consent to the activity. Sexual violence includes sexual assault, rape, battery, and sexual coercion, domestic violence, dating violence and stalking.
- **Domestic Violence** is defined as any felony or misdemeanor crime committed by a current or former spouse of the victim; person the victim has a child with; an individual who cohabitates, or has lived with the victim as a spouse, or a person similarly situated to a spouse; and any other person committing an act against an adult or youth who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- **Dating Violence** is defined as violence committed by a person who has been in a social relationship of a romantic or intimate nature with the victim (based on the length and type of relationship and frequency of interaction).
- **Stalking** is defined as engaging in conduct directed at a specific person that would cause a reasonable person to (a) fear for their safety or the safety of others; or (b) suffer substantial emotional distress.
- Consent is informed. Consent is an affirmative, unambiguous and conscious decision by each participant to engage in mutually agreed-upon sexual activity. Consent is voluntary. It must be given without coercion, force, threats, or intimidation. Consent means positive cooperation in the act or expression of intent to engage in the act pursuant to exercising free will. Consent to some form of sexual activity does not imply consent to other forms of sexual activity. Consent to sexual activity on one occasion is not consent to engage in sexual activity on another occasion. A current or previous social or sexual relationship, by itself, is not sufficient to constitute consent. Consent must be on going and may be revoked at any time. Once consent is withdrawn, the activity must stop immediately. Consent cannot be given when the person is incapacitated or coming in and out of consciousness, under the threat of violence, bodily injury, or other forms of coercion.
- *Incapacitation* is defined as the physical and/or mental inability to make informed, rational judgments. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where drugs or alcohol are involved, incapacitation is defined with consideration to how the substance consumed affects a person's decision making capacity, awareness of consequences, and ability to make fully informed judgments. Being intoxicated by drugs or alcohol does not diminish one's responsibility to obtain consent.

# Reporting Sexual Assault/Criminal Offense Policy and Procedures

- In the event of a sexual offense /criminal offense, students are encouraged to contact 911 immediately and then contact either the Dean of Students, School Director, Director of Education, or Assistant Director or other available school authority.
  - o Students may request assistance from the CSHA in calling 911.
  - o Students may decline to notify 911 and will continue to receive support from CSHA.

# Preserving Evidence:

It is important to preserve evidence of any offense – it may be necessary proof to obtain a protection order or to prosecute the offender.

o **Sexual Assault: To preserve evidence after a sexual assault**, individuals should seek a medical examination and evidence collection at a hospital or medical facility immediately. Forensic evidence collection is best done within 72 hours of the assault and ideally collected immediately

following the assault. A Sexual Assault Forensic Examination (SAFE) can preserve evidence for up to 96 hours (4 days) after an assault.

- To preserve evidence in the case of sexual assault, it is recommended that you do not shower or bathe, wash your hands, use the toilet, douche, eat, drink, smoke, brush your teeth, change clothing, or wash clothing or bedding before a medical exam. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care.
- If you wish to make a report to the police, or if you wish to have evidence collected so you can make this decision later, you may seek services by calling the local police dispatch number or request evidence collection at a medical facility.
- It is preferred that a police department or medical facility facilitates the collection of forensic evidence. However, if you are not sure if you would like to report to the police or if it has been longer than 72 hours after the assault, you may wish to gather all clothing and bedding that may be used for evidence and place them into a clean paper bag or clean sheet. Items should be stored at room temperature that will not damage evidence.
- O Dating or Domestic Violence: In the case of dating violence and domestic violence, the resource you choose to report the crime to (a doctor, the police, an advocate, etc.) may recommend ways to preserve evidence such as logging incidents, photographing injuries, seeking medical care, etc.
- o **Stalking**: Stalking is demonstrated through a pattern of unwanted contact. Documenting stalking can include logging unwanted contact, saving and photographing unwanted text messages, emails, letters and gifts and storing them in a secure location.

#### Counseling:

If an individual wishes to find counseling services for victims of sexual assault, contact the Dean of Students, Director of Education, School Director/VAWA coordinator. For a listing of resources, please see the Community Resource section in this document.

# Support:

If a victim of sexual assault is in need of a change in class or schedule due to the assault, a request should be made by the complainant to the Dean of Students or Director of Education. Every effort will be made to accommodate this request. The student will be notified of the options.

# Reporting VAWA, Title IX violations at CSHA:

Reports of conduct that may constitute a violation of VAWA, Title IX, Discrimination, Harassment or Hate crimes may be made to either the

- Director/VAWA Coordinator (Chris Smith),
- Assistant Director/Title IX coordinator (Amy Chavez),
- Dean of Students (Cathy Lewis),
- Director of Education (Kris Will),
- CSHA Instructors/Staff Reporting to CSHA Instructors/Staff will require them to report to the School Directors.

Reports can be at any time after the incident. Delaying a report may impede the school's ability to conduct an investigation and/or to take appropriate remedial actions.

Please be advised that conversations with fellow students, friends or outside confidential sources are not VAWA or Title IX reporting and will additionally require you to speak with School administration, instructors and/or the VAWA or Title IX coordinators listed in this policy.

See confidentiality section in this document.

# Filing a Complaint for Title IX, VAWA, Discrimination, Harassment, Hate Crimes: To file a complaint:

VAWA Coordinator/ Director – Chris Smith, 303-986-2320, ext. 27 <a href="mailto:chris@csha.net">chris@csha.net</a>
Title IX Coordinator/ Assistant Director – Amy Chavez, 303-986-2320, ext. 24 <a href="mailto:amy@csha.net">amy@csha.net</a>
Director of Education – Kris Will 303-329-6026 (cell) <a href="mailto:kris@csha.net">kris@csha.net</a>
Dean of Students – Cathy Lewis, 303-986-2320, ext. 28 <a href="mailto:cathy@csha.net">cathy@csha.net</a>

#### <u>Time Line</u> for Title IX, VAWA complaint process: (for complainant and respondent):

- Complainant someone who reports they are a victim of Title IX or VAWA violations.
- Respondent someone who is reported to have engaged in Title IX of VAWA violations.
- CSHA will acknowledge receipt of the complaint in writing to the complainant and the respondent within (3) three business days.
- The investigation part of the process will be completed within thirty (30) business days from the date of the written acknowledgment of receipt of the complaint unless circumstances demand that an extension be granted by the Director/VAWA Coordinator or the Assistant Director/Title IX Coordinator. Both parties will be informed of any extension.
- The school will issue a written statement of the findings of the investigation to both the complainant and the respondent within fourteen (14) business days of the completion of the investigation/hearing. The Findings Statement will be sent to the Complainant and Respondent via certified mail with return receipt through the U.S. Postal System
- Appeals of investigation outcomes/decisions may be submitted within five (5) business days after date of written receipt of the decision.

# Investigation Process for a Title IX or VAWA complaint involving CSHA students:

- CSHA will provide an equally prompt, transparent and unbiased investigation to both the **complainant** (*individual who is alleged to be the victim*) and the **respondent** (*an individual who has been reported to be the alleged perpetrator*).
- CSHA will acknowledge receipt of the complaint in writing within (3) three business days.
- The investigation process will be completed within thirty (30) business days from the date of the written acknowledgment of receipt of the complaint unless circumstances demand that an extension be granted by the Director/VAWA Coordinator, the Director of Education or the Assistant Director/Title IX Coordinator.
- The investigation will be conducted by a CSHA administrator(s) with no conflict of interest, or bias who has received annual training on Title IX and VAWA complaint process.
- The investigation provides a process that enables the decision maker(s) to question parties and witnesses to gather evidence and adequately assess their credibility (if in dispute and relevant).
  - During the investigation, the school will objectively gather any and all evidence, review all school
    policies, speak with faculty, staff and/or students and respond to the initial complainant and the
    respondent.
  - Any relevant (non privileged) evidence gathered will be available to either party.
  - Sufficient information about the allegation will be provided to the respondent to allow the respondent to respond to the allegations (identifying the parties involved, conduct alleged, dates and

- location of alleged evidence). The respondent is presumed not responsible until evidence shows the respondent was in violation of Title IX or VAWA.
- Ouring the investigation, the decision-maker and/or investigator (CSHA) will record meetings at which questions are posed to the complainant or respondent or witnesses (individually). The recording or transcriptions will be provided to the complainant or respondent for the purpose of allowing the parties to propose follow up questions. The investigator (CSHA) will ask the follow up questions to the parties involved (individually) in additional recorded meetings.
- Both the complainant and respondent have equal opportunities for an advisor of their choice to be present at any meeting or interview
- Decisions will be made based on Preponderance of Evidence Standard. (What is more likely than not to have happened. Of the evidence presented by the complainant, respondent and witnesses, which is more credible and convincing or shows that the fact to be proven is more probable than not.)
- Investigations and hearings will follow the requirements in Title IX and VAWA rules.

## Decision (Findings) and Response:

- The school will issue a written statement of the findings of the investigation within fourteen (14) days of the completion of the investigation. The Findings Statement will be sent to the Complainant and Respondent via certified mail with return receipt through the U.S. Postal System.
  - o The Findings Statement will include a determination as to whether any Title IX or VAWA violations took place and will include any supportive measures for the complainant and any appropriate remedy or disciplinary actions for the respondent up to and including dismissal from the school. Disciplinary actions shall be determined on a case-by-case basis.

Decision (Findings) and Response continued:

- <u>Supportive Measures</u>: Students/employees have the right to request these protective measures, if they can be reasonably accommodated, regardless if notification to law enforcement has been made or if the investigation/hearing outcome has yet to be determined. Possible supportive measures that may be requested by the complainant: change of schedule, leave of absence (LOA), withdrawal with ability to return without penalties, no contact orders for the respondent.
- <u>Disciplinary Actions for Students</u>: Possible remedies/disciplinary actions for student respondent: probation, interim measures (suspension, leave of absence no contact orders, altered schedule, or any measures the school deems necessary to protect the safety of the CSHA community) or dismissal with or without ability to reapply.
- <u>Disciplinary actions for employees:</u> Possible remedies/disciplinary actions for employees for violations of Title IX or VAWA Policy: Disciplinary action may include, but is not limited to probation, paid/unpaid suspension from work, altered work schedule, training or counseling specific to the offense or termination with or without the opportunity to re-apply for future employment.
- The final decision for any disciplinary action taken will be made by the Director/VAWA Coordinator, and/or Assistant Director/Title IX Coordinator, and/or the Director of Education and/ or their designee.

# Appeals of investigation/hearing outcomes/decisions

• Appeals of investigation/hearing outcomes/decisions may be submitted within five (5) business days after date of written receipt of the decision. Granting an appeal will be based on the ability to demonstrate any procedural irregularities, new evidence or conflicts of interest.

# Informal Resolution:

- If both parties agree, an Informal Resolution is always an option for complainant and respondent.
- Participation in an informal resolution is strictly voluntary for complainant and respondent.
- An informal resolution would mean that both parties choose to forgo an investigation and decision by the school and choose to resolve the complaint by agreeing on and committing to following one or more of the following supportive/disciplinary measures:
  - o Probation.
  - o Change of classroom or schedule.
  - o No contact agreements.
  - o Regular check-in meetings with designated CSHA administrator.
  - o Leave of Absence (LOA).
  - o Compliance with additional training.
  - o Compliance with additional counseling (off campus, out of pocket).
  - Other as agreed upon by all parties and CSHA.

## Dismissing of a Complaint:

- CSHA may dismiss a complaint for the following reasons:
  - o CSHA is unable to identify the respondent after taking reasonable steps to do so.
  - The respondent is not participating in CSHA's education program/classes or is not employed by CSHA.
  - The complainant voluntarily withdraws the complaint and the Title IX Coordinator determines that without the complainant's withdrawn allegations, the conduct that remains alleged in the complaint if any, would not constitute Title IX or VAWA violations even if proven.
  - o CSHA determines the conduct alleged in the complaint, even if proven, would not constitute Title IX or VAWA violations.

#### Retaliation:

CSHA strictly prohibits, and will not tolerate, reprisals against any individual due to the participation in this process. A claim of retaliation shall be treated as a separate allegation of discrimination. The Colorado School of Healing Arts prohibits retaliation against a person who reports any form of discrimination, act of violence or harassment as defined in the school's Title IX or VAWA Policy. Additionally, retaliation is strictly prohibited against someone who assists another person with a complaint or a person who participates in the investigation and/or resolution of a complaint. Retaliation includes, but is not limited to threats, intimidation, and/or adverse actions related to employment or education.

# Confidentiality

The Colorado School of Healing Arts shall protect the privacy of individuals involved in a report of any Title IX or VAWA violations in accordance with the Title IX rules, the VAWA rules and the Family Educational Rights to Privacy Act (FERPA), Colorado Law and CSHA policies. Both complainant and respondent have the right to full transparency during the investigation of the complaint.

A report of violations such as these may result in the gathering of extremely sensitive information about individuals in the school community. While such information is considered confidential, the school's obligations in accordance with FERPA may require CSHA to release personal information to appropriate officials due to a subpoena or judicial order. FERPA also permits disclosure to the complainant the final results of a disciplinary proceeding against the respondent, regardless of whether or not the school determined that a violation was committed.

Information regarding disciplinary action taken against the respondent shall not be disclosed except to the complainant without the respondent's consent, unless permitted by law, or unless it is necessary to ensure compliance with the safety of individuals.

#### Counseling:

For support in locating counseling services, contact the Dean of Students, Director of Education, School Director/VAWA coordinator. For a listing of resources, please see the Community Resource section in this document.

#### Support:

If the complainant is in need of a change in class or schedule due to the circumstances of a complaint, a request should be made to the Dean of Students or Director of Education. Every effort will be made to accommodate this request. The student will be notified of the options.

# Community Resources - Domestic Violence / Sexual Assault 24-Hour Domestic Violence, Crisis Lines, and Shelters

National Domestic Violence Hotline: 1-800-799-7233 <a href="http://www.thehotline.org">http://www.thehotline.org</a> "Operating around the clock, seven days a week, confidential and free of cost, the National Domestic Violence Hotline provides lifesaving tools and immediate support to enable victims to find safety and live lives free of abuse." Also has chat and text options.

Visit the following website to learn what is considered abuse and how to create a personalized safety plan: http://www.loveisrespect.org.

Colorado Crisis Services <a href="https://coloradocrisisservices.org/">https://coloradocrisisservices.org/</a> 1-844-493-8255 Crisis Hotline Also has online and walk in locations. Call, text or walk-in they provide 24/7 free confidential and immediate support for whatever crisis you may be going through.

The Center for Trauma & Resilience (303) 860-0660 (Admin) www.traumahealth.org

24-Hour Hotlines: English(303) 894-8000

Espanol (303) 718-8289

Use 711 Relay Colorado for the Hearing Impaired to access our hotlines.

Formerly known as the Denver Center for Crime Victims, "The Center for Trauma & Resilience provides culturally and linguistically responsive programs, health promotion and crime prevention education." Services include 24-Hour crisis lines (English, Spanish and TDD), crisis intervention, assistance and advocacy, referrals, short-term counseling, education and training, and support groups.

**Denver Affordable Counseling in Lakewood, CO** <u>Denver Affordable Counseling in Lakewood, CO</u> Offers in-person and online counseling for individuals, couples and families at affordable rates. May be covered by insurance or may offer a sliding scale. "...a safe and inclusive space for all."

Family Tree, Inc.- Domestic Violence Services for Denver, CO and the Surrounding Areas https://www.thefamilytree.org/domestic-violence-services

24-hour Domestic Violence Hotline: (303) 420-6752

Homelessness Helpline: (303) 467-2604 3805 Marshall Street, Wheat Ridge, CO 80033

Family Tree is a non-profit human services agency providing innovative, life-changing services designed to end child abuse, domestic violence and homelessness.

#### The Blue Bench - Ending Sexual Assault Through Education and Care

**24 Hour Crisis Hotline** (303) 322-RAPE (7273) or (Espanol) (303) 329-0031

www.thebluebench.org

Provides a 24-hour crisis intervention counseling, counseling services and referrals, prevention education, programs for special populations, and self-defense instruction.

**RAINN** (Rape, Abuse & Incest National Network) (800) 656-HOPE (4673) – 24/7 National Sexual Assault Hotline (English and Spanish).

Online hotline: <a href="https://ohl.rainn.org/online">https://ohl.rainn.org/online</a> Anti-sexual assault organization that provides a 24-hour phone or online hotline with programs to prevent sexual violence helps victims. Also offers chat.

#### WINGS Foundation, Inc. (303) 238-8660 or 888-505-4325 (HEAL) www.wingsfound.org/

Wings is building systems of support for adult survivors, combining in-depth health expertise with the healing power of community.

End of CSHA Personal Safety, Anti-Discrimination/Anti-Harassment, Title IX and Violence Against Women Act (VAWA) Policy Handbook August 1, 2024 edition.

# POLICY OF MAINTAINING A DRUG AND ALCOHOL FREE LEARNING ENVIRONMENT

Performing Massage Therapy under the influence of drugs (over the counter, prescription, illegal, and medical/recreational marijuana) and/or alcohol may impair your judgment, focus, and ability to create a safe and therapeutic environment. Students performing Massage Therapy while under the influence risk Probation/Suspension/Dismissal or the ability to become a Licensed Massage Therapist. The CSHA Drug and Alcohol policy requires that students refrain from drug and/or alcohol use a minimum of 12 hours prior to giving or receiving massage and bodywork (prescription narcotic, illegal drugs, medical/recreational marijuana).

CSHA is required to follow Federal Law in regards to the Drug and Alcohol Policy. As such, students are not allowed to use, possess, carry or distribute recreational or medical marijuana on the school property (including in the building, parking lot, or in cars).

All members of the CSHA community are hereby notified that the unlawful possession or use of illegal drugs, medical/recreational marijuana, and alcohol is prohibited anywhere on school campus.

The institution is in compliance with the Drug Free Schools and Communities Act of 1989 (Public Law 101-226). All students and employees should refer to the Clery Act Campus Security Report for more information concerning the campus policies and individual responsibilities required under this Act.

#### DRUG AND ALCOHOL PREVENTION PROGRAM

The Colorado School of Healing Arts has established a Drug and Alcohol Free Awareness Program (DAFAP). The DAFAP encompasses the following four phases:

#### **PHASE ONE**

WARNING OF THE DANGERS OF DRUG AND ALCOHOL ABUSE:

Drug and alcohol use impairs memory, alertness and achievement. It erodes the capacity to perform, think and act responsibly. It may be grounds for termination of your enrollment with the institution or other legal action. SCHEDULE A specifically details the Uses and Effects as it relates to alcohol.

#### PHASE TWO

THIS INSTITUTION HAS A POLICY OF MAINTAINING A DRUG AND ALCOHOL FREE LEARNING ENVIRONNENT

All students and employees are hereby notified that the unlawful manufacture, distribution, dispensing, possession or use of illicit drugs and alcohol is prohibited in the institution's learning environment. Any student

or employee must notify the institution of any criminal drug and alcohol statute conviction for a violation occurring in the learning environment no later than five days after such conviction. In compliance with the Drug-Free Workplace Act of 1988, the institution's "workplace" consists of the following locations:

Colorado School of Healing Arts, 7655 W. Mississippi Ave, Lakewood, CO or any "off-site" location (i.e. internships, sporting events, field trips, meetings, etc.) where the activities are in any way related to the institution.

#### PHASE THREE

LISTING OF THE AVAILABLE LOCAL DRUG COUNSELING, REHABILITATION AND ASSISTANCE PROGRAMS:

Please refer to SCHEDULE B.

#### **PHASE FOUR**

NON-COMPLIANCE WITH THE TERMS OF THIS INSTITUTION'S DRUG-FREE WORKPLACE STATEMENT

Non-compliance will result in the following action being taken by this institution:

The student or employee would be required to actively participate in a drug or alcohol abuse assistance or rehabilitation program approved by federal, state or local health, law enforcement or other appropriate agency. Attached SCHEDULE C contains a description of the applicable legal sanctions under local, State, and Federal law for unlawful possession, use, or distribution of illicit drugs and alcohol. Community service with one of the above stated agencies. Termination of enrollment

#### **SCHEDULE A**

#### ALCOHOL USES AND EFFECTS

Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low to moderate doses of alcohol also increases the incidence of a variety of aggressive acts, including spouse and child abuse. 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. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver.

Mothers who drink alcohol 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 other youngsters of becoming alcoholics.

#### **SCHEDULE B**

DRUG COUNSELING, REHABILITATION, AND ASSISTANCE PROGRAMS
Touchstone Counseling Center
777 South Wadsworth Boulevard
Irongate 2 Suite 205
Lakewood CO 80226
(303) 989-9577

#### **SCHEDULE C**

FEDERAL PENALTIES AND SANCTIONS FOR ILLEGAL POSSESSION OF A CONTROLLED SUBSTANCE

21 U.S.C. 844(a)

First conviction: Up to 1-year imprisonment and fined at least \$1,000 but not more than \$100,000, or both.

After one prior drug conviction: At least 15 days in prison, not to exceed 2 years and fined at least \$2,500 but not more than \$250,000, or both.

After 2 or more prior drug convictions: At least 90 days in prison, not to exceed 3 years and fined at least \$5,000 but not more than \$250,000, or both

Special sentencing provisions for possession of crack cocaine: Mandatory at least 5 years in prison, not to exceed 20 years and fined up to \$250,000, or both if:

1st conviction and the amount of crack possessed exceeds 5 grams

2nd crack conviction and the amount of crack possessed exceeds 3 grams

3rd or subsequent crack conviction and the amount of crack possessed exceeds 1 gram.

21 U.S.C. 853(A)(2) AND 881(A)(7)

Forfeiture of personal and real property used to possess or facilitate possession of a controlled substance if that offense is punishable by more than 1-year imprisonment. (See special sentencing provisions re: crack)

21 U.S.C. 861(A)(4)

Forfeiture of vehicles, boats, aircraft or any other conveyance used to transport or conceal a controlled substance.

21U.S.C. 844a

Civil fine up to \$10,000 (pending adoption of final regulations).

21U.S.C. 853a

Denial of Federal benefits, such as student loans, grants, contracts, and professional and commercial licenses, up to 1 year for the first offense, up to 5 years for second and subsequent offenses.

18U.S.C. 922(g)

Ineligible to receive or purchase firearm.

Miscellaneous

Revocation of certain Federal licenses and benefits, e.g. pilot's licenses, public housing tenancy, etc., are vested within the authorities of individual Federal agencies.

Note: These are only Federal penalties and sanction. Additional State penalties and sanctions may apply.

#### VACCINATION POLICY

CSHA does not require vaccinations. This is subject to change per state and local regulations.

#### **COPYRIGHT INFRINGEMENT**

Unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject you to civil and criminal liabilities, including fines.

For more detailed information: http://www.copyright.gov/

#### HIGH SCHOOL DIPLOMA VALIDATION

Changes to the Federal Register/Vol. 75, No. 117 / Friday, June 18, 2010 requires institutions to have procedures to evaluate the validity of a student's high school diploma if the institution has reason to believe that the diploma is not valid or was not obtained from an entity that provides secondary school education. Following are those procedures for CSHA:

- Check with the department of education for the state in which the school is located.
- Contact the Better Business Bureau or the State Attorney General's office to confirm the school is operating legally in a state and see if anyone has filed a complaint.

# **CAMPUS MAP**

7655 W. Mississippi Ave., Lakewood, CO 80226

Key
CSHA Campus = \_\_\_\_\_
Public = \_\_\_\_

