

2023

Annual Security Report



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Office of Public Safety and Security
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Mission Statement

NUNM is concerned about the safety and welfare of all campus members and guests, and commits itself to promoting a safe and secure environment. The Office of Public Safety and Security strives to achieve this mission by means of a community-friendly approach that enhances security through the visibility of safety officers, preventive patrols, positive conflict resolution, and crime prevention and awareness programs. NUNM has developed a series of policies and procedures designed to ensure that every possible precaution is taken to protect the campus community.

To Report a Crime

To report a crime, call the Office of Public Safety and Security at 503.830.3613. In the event of crime being committed in your presence or an emergency, call 911. After the incident is reported to the local police, contact Security. A security officer will be sent to record the details of the incident and write a report. You may also make a report in person by visiting the Security Office, in room 125 of the Academic Building at 49 S Porter Street or emailing security at security@nunm.edu. If it's a confidential matter, NUNM's Director of Security can be contacted at 503.552.2016. The Office of Public Safety and Security encourages accurate and prompt reporting of all campus crime within 24 hours of an incident.

Security officers may also assist a person in reporting crimes to local law enforcement at that person's request, or if the victim of a crime is unable to immediately do so.

Anonymous and Confidential Crime Reporting

If you wish to report a crime anonymously or confidentially, you may submit an online incident report via the NUNM website at: https://nunm-advocate.symplcity.com/public_report/.

Timely Warnings and the Importance of Reporting Crimes

The director of public safety or a designee will develop timely warning notices to notify members of the University community about serious crimes against people or property that occur within the core campus boundaries (which includes University owned or controlled property on campus and public property that is within or immediately adjacent to the campus) and in non-campus properties as defined by the Clery Act. Although not required by Federal Law, timely warning notices may also be distributed for crimes that occur in areas outside of the Clery Act geographic areas, if the crime is deemed to pose an ongoing threat to the campus community. The decision to issue a timely warning notice for an off-campus crime will be made on a case by case basis depending on an assessment of various factors which include but are not limited to: the nature of the crime, the exact location, the time of the incident, the local police response and guidance to campus officials and the potential direct effect on the campus community. These will be considered Campus Safety Bulletins.

A timely warning notice will be distributed when it is determined that the incident may pose an ongoing or serious threat to members of the National University of Natural Medicine's community. These warnings will be distributed if the incident is reported either to the Office of Public Safety directly or indirectly through a campus security authority (Portland Police Bureau (PPB))

The Office of Public Safety issues/posts timely warning notices for incidents of

- Murder/Non-Negligent Manslaughter
- Aggravated assault (cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case-by-case basis to determine if the individual is believed to be an on-going threat to the larger NUNM community)
- Robbery involving force or violence (cases including pick pocketing and purse snatching will typically not result in the issuance of a Crime Alert, but will be assessed on a case-by-case basis)
- Sexual Assault (considered on a case-by-case basis depending on the facts of the case, Title IX limitations in terms of confidentiality, when and where the incident occurred, when it was reported, and the amount information known by public safety)
- Major incidents of arson
- Other crimes as determined necessary by the director of public safety or their designee

A timely warning notice will typically include the following, unless issuing any of this information would risk compromising law enforcement efforts*:

- Date and time or timeframe of the incident
- A brief description of the incident
- The location of the incident
- Information that will promote safety and potentially aid in the prevention of similar crimes (crime prevention or safety tips).
- Suspect description(s) when deemed appropriate and if there is sufficient detail (see below)
- Police/Public Safety agency contact information
- Other information as deemed appropriate by the director of public safety or their designee

*NOTE: The University will not withhold a basic description of the reported crime under the auspices of the risk of compromising law enforcement efforts. Specific details, such as the exact location, the specific date, etc. could be withheld if releasing that information may compromise law enforcement efforts (such as conducting an investigation, serving a warrant, or conducting an undercover operation, etc.).

The description of subjects in a case will only be included in the alert if there is a sufficient amount of detail to describe the individual. If the only known descriptors are sex and race, that will not be included in the alert.

The director of public safety, or designee, will draft an email containing the proposed Timely Warning and may seek assistance/guidance from members of the Marketing and Communications. The director of public safety, or designee, will then transmit the email containing the Timely Warning to the NUNM All and All Students Listservs as a blast email. Updates to the NUNM community about any particular case resulting in a timely warning notice also may be distributed on the University website.

Timely Warnings may also be posted in campus buildings, when deemed necessary. When a Timely Warning is posted in campus buildings, it shall be printed and be posted in the lobby/entrance area of

the affected building(s) for five (5) days. Timely warning notices are filed in the Clery Audit Trail binder with the corresponding incident reported in Advocate (campus safety reporting system).

Preparation of the Annual Security Report

The annual security report includes information on crime statistics for the campus and surrounding area for the previous three years. It also includes information on campus safety and security policies and procedures. The report is compiled yearly by the Director of Security and Chief of Staff and Community Relations and updated every October to include crimes that occurred during the previous year. Crime statistics are gathered by reviewing reports made to the online incident reporting system, campus security officers, as well as to the local police department. Portland Police Bureau information is gathered by retrieving information from the Public Records Request Division.

Daily Crime Log

In addition to the annual reporting of the above referenced major crimes over the prior three-year period, the Office of Public Safety and Security maintains a daily crime log that lists daily safety activities and current reported crimes. This log can be accessed, upon request, from the Director of Security.

Campus Security Authorities

When reporting a crime that has taken place on campus, any person may report a crime to the following people for the purpose of inclusion in the annual security report or for consideration of a timely warning.

- Director of Security
- Lead Security Officer
- Security Officer
- Dean of Students
- Faculty Representative to a Student Club
- Human Resources Generalist
- Director of Human Resources

Campus Access Policy

The NUNM campus is privately owned property, however it is generally open to the public during business hours and public events. The Office of Public Safety and Security has the authority to issue verbal or written trespass warnings to any individual who behaves in a way that may compromise the safety of the NUNM community. Campus buildings are locked at all times and are accessible only by an ID Key Badge that all NUNM community members have. Events that allow public access require an NUNM community member to grant entry into all buildings on campus. Security officers patrol campus buildings, and grounds and parking lots, ensuring the security of the campus throughout the day. Non- NUNM students or employees are contacted by security officers when seen entering areas restricted to NUNM community members. These areas include, but are not limited to, the 2nd floor of the Academic Building, 3rd floor of the

Academic Building, employee offices, NUNM Health Center conference rooms, and classrooms that do not have a scheduled activity.

NUNM students and employees are expected to carry their student or employee IDs with them while on campus. NUNM security officers may ask for identification in order to ensure that appropriate access to certain areas is maintained.

Maintenance of Campus Facilities

NUNM Public Safety and Security employees as well as Facilities employees make regular patrols of campus buildings in order to identify maintenance issues. Community members are encouraged to report maintenance issues to either the Office of Public Safety and Security or the Facilities department by email or telephone. Once a report is received, a security officer or facilities employee will respond to the area and determine a course of action. Temporary measures may be implemented to mitigate any hazards, such as roping off an area with caution tape, before a permanent fix is found. Once the hazard has been identified and proper mitigation strategies implemented, the security officer or facilities employee will then make the proper arrangements to fix the hazard or ensure that it is no longer a danger to the community.

Community Safety Authority and Jurisdiction

NUNM security officers have the authority to enforce university policy and rules, but are not sworn law enforcement officers and can only perform a citizen's arrest for crimes in which there are witnesses, per Oregon law. However, the Office of Public Safety and Security is able to call on the Portland Police Bureau (PPB) for assistance with law enforcement. If a victim of a crime prefers, NUNM security officers may assist by reporting a crime to the PPB or the appropriate agency. Public Safety and Security refers major crimes to PPB and collaborates in further investigation of these incidents. NUNM security officers do not carry weapons. We encourage community members to report a crime to the appropriate law enforcement agency as soon as possible.

NUNM security officers have jurisdiction over all NUNM owned property, including property leased by the university for academic purposes within the State of Oregon. Officers patrol along public roads in order to perform their duties; in doing so, they will take reports of any crimes reported to have occurred immediately adjacent to NUNM property.

Crime Prevention and Security Awareness Programs

During orientation, students are informed of services offered by the Office of Public Safety and Security. In addition, they're told about crime on campus and in the surrounding neighborhood. Numerous efforts are made to advise members of the community in a timely manner about campus crime and crime-related problems. All new staff and faculty are involved in a mandatory new employee training that includes safety and security information. All currently employed staff also receive a refresher training once a year on a variety of topics that include crime prevention and security awareness.

A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their own safety and the security of others. Most of the information covered during crime prevention and security awareness programs is also available online.

Other prevention and awareness activities take place throughout the year and may include things such as: posters, handouts, community hour presentations, or demonstrations.

Monitoring Off-Campus Criminal Activity for the Safety of Off-Campus Organizations

Public Safety and Security does not provide security services to off-campus student groups. Criminal activity in Portland is monitored and recorded by the Portland Police Bureau (PPB), in collaboration with Public Safety and Security, when violations of federal, state or local laws surface.

Emergency Response Procedures

The administration of NUNM recognizes the significance of maintaining an “Integrated Structured Emergency Response and Evacuation Plan” to ensure the safety and well-being of faculty, students, staff and visitors in the event of an emergency.

The Emergency Plan and Evacuation Plan offers guidelines and procedures for responding to defined events that can threaten the safety and welfare of our community and/or disrupt school programs and activities. A full version of the Emergency Plan and Evacuation Plan are available on the NUNM website in the Public Safety and Security section.

Emergency Communications

NUNM has implemented *Final Site Connect*, a rapid broadcast alert and notification system, as part of its Emergency Plan. In the event of an emergency, *Final Site Connect* enables immediate communication with individual members of the university community by voicemail, e-mail messages, and text messages to cell phones. Enrollment in the *Final Site Connect* system is automatic for all students and staff.

In the event of an emergency, Public Safety and Security officers will, without delay, assess the situation and report to the Director of Security. The Director of Security will determine if the community is in danger, and if so, respond by sending an emergency notification to effected segments of the community. Alternatively, if members of the President’s Cabinet determine that there is a danger to the community they can request that the Director Security issue an emergency notification. Due to the size of the campus, emergency notifications will typically be sent to all community members. In certain circumstances, the Director of Security may confer with President Cabinet members prior to issuing an emergency notification.

Emergency notification content is developed at the discretion of the Director Security and with the approval of the President's Cabinet upon the confirmation of a danger to the community. Templates of typical emergency notifications may be created prior to an emergency to allow for more expedient notification.

Immediate Notification

If a serious crime, a natural disaster or a man-made emergency occurs that poses an immediate threat to the health and safety of the NUNM community or a segment of the NUNM community, federal law requires that the institution immediately notify the campus community or the appropriate segments of the community that may be affected by the situation. If the institution implements the procedures regarding notification of the NUNM community for an immediate threat, the institution is not obligated to implement the timely warning notice procedures. The types of incidents that may cause an immediate threat to the NUNM community could include but are not limited to emergencies such as:

1. active shooter on campus
2. hostage/barricade situation
3. bomb threat
4. terrorist threat
5. riot
6. suspicious package with confirmation of a device
7. tornado or severe weather event
8. fire/explosion
9. suspicious death
10. structural damage to a UHSP owned or controlled facility
11. biological threat (anthrax, etc)
12. significant flooding
13. gas leak
14. hazardous materials spill, etc.

Public safety has a responsibility to respond to such incidents to determine if the situation does in fact pose an immediate threat to the community. Public safety or a designee of the University will activate the immediate notification system. The content of the message and methods of distributing the message will be determined by a select handful of University administrators, if time permits. This is described below on the various methods of communication the threat to the NUNM community or to the appropriate segment of the community if the threat is limited to a particular building or segment of the population.

As per the requirements of the law, public safety 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 judgment of the first responders (including, but not limited to the Portland Police Bureau, City of Portland Fire and Emergency Medical Service, etc.), compromise the efforts to assist a survivor or to contain, respond to, or otherwise mitigate the emergency.

The various systems the institution has in place for communicating information quickly to the NUNM community, included but are not limited to:

- NUNM Advocate Campus Safety Reporting: https://NUNM-advocate.symplicity.com/public_report/.
- Final Site Connect Alert System
- Flash Alert Notices sent to NUNM Email addresses
- NUNM Outlook Email NUNM Website

The Office of Marketing and Communications will post updates during a critical incident on the NUNM website at <https://nunm.edu>

Some or all of these methods of communication may be activated in the event of an immediate threat to the NUNM campus community.

When issuing statements to the public, outside of NUNM community members, a designee from Marketing and Communications will confer with the President's Cabinet and the Director of Security prior to issuing any information.

Emergency Types

The administration has used FEMA guidelines to identify specific types of emergencies as those most likely to either threaten or disrupt the university community.

1. Bomb Threat
2. Fire and Explosions
3. Hazardous Material Release
4. Suspicious Package
5. Adverse Weather Conditions
6. Major Threat or Incident in Metro Area
7. Utility Outage
8. Medical Emergency
9. Flooding
10. Workplace Violence
11. Gunfire (Active Shooter)
12. Hostage Situation
13. Death or Serious Injury
14. Earthquake

The Emergency Plan, based on the FEMA Incident Command System, requires the appointment of an Incident Commander (IC), (or designee), who is expected to bear responsibility for the management of each of the emergencies cited above. It also requires a Crisis Response Team (CRT) drawn from NUNM's senior administrative and academic leadership, whose roles are to coordinate the campus response in the event of major incidents. Depending upon the classification and nature of the emergency, the Incident Commander (or designee) will mobilize the Crisis Response Team and the

President's Cabinet.

The Incident Commander will then work closely with the President's Cabinet to oversee any long-term and executive-level considerations. The Chair of the Crisis Response team will take command of the Crisis Response Team: the Chair will focus on more immediate concerns, including: accounting for students and staff, initiating stop gap measures, and make initial determinations on how each department is to function during the course of the emergency response. When the Incident Commander (or designee) activates the Crisis Response Team, team members will immediately report to the office of the Director of Security. Similarly, should the Incident Commander assemble the President's Cabinet, members will immediately report to the Administration Building conference room.

In a state of emergency, and when the Incident Commander requests its activation, the President's Cabinet functions as the university-wide, decision-making body.

Crisis Response Team

The Crisis Response Team fulfills many operational functions during an emergency and is the primary vehicle for managing emergency response from an operational standpoint.

Emergency Response Leadership Procedures

In a state of emergency, the NUNM President provides executive leadership for the entire emergency response process. The Director of Security (or designee) is the Incident Commander (IC). For purposes of coordination, the Incident Commander serves as the President's Cabinet team leader throughout the emergency and is responsible for the operational direction of the response. The next in line of succession to the Incident Commander is the CFO.

The President's Cabinet functions as the university-wide policy making body for the emergency. The Crisis Response Team (CRT), drawn from the university's administrative personnel, coordinates the operational campus response to major incidents. The Emergency Response Plan identifies the specific positions and/or individuals that comprise both the President's Cabinet and the Crisis Response Team.

In the event of an emergency, the Incident Commander collects intelligence, evaluates the emergency, and determines whether to activate the Crisis Response Team. Simultaneously, the Incident Commander must determine whether to ask the President to convene all or part of the President's Cabinet. Again, this should occur after the security and facilities departments have assessed the emergency conditions. The nature of an emergency may change over time, so that the Incident Commander (or designee) may deal with a Level-1 emergency, but may have to activate the Crisis Response Team and request the activation of the President's Cabinet if the nature of an emergency escalates.

Throughout a declared emergency, the Incident Commander interfaces with the President’s Cabinet and the Crisis Response Team. To facilitate this communication, the Incident Commander generally designates a team leader for the Crisis Response Team with skills appropriate to address the particular emergency event at hand.

Throughout a high-level emergency, the Incident Commander gathers intelligence from the Crisis Response Team headquartered in the Primary Command Center, which is located in the office of the Director of Security. The Crisis Response Team addresses operational issues and is responsible for securing information to present to the President’s Cabinet.

Throughout the emergency, the Incident Commander receives information and disseminates it to the President’s Cabinet and the designee in the Office of Marketing and Communications. The designee in the Office of Marketing and Communications, with the guidance and upon the authority of the President and the President’s Cabinet, coordinates all decisions regarding external and internal communication about the emergency. The designee in the Office of Marketing and Communications is responsible for communication with the university community, and the public and the media, as necessary.

When emergency conditions abate, the Incident Commander—after appropriate consultation with the President’s Cabinet—will determine the appropriate time to deactivate the Crisis Response Team.

The Emergency Operation Centers

In cases of high-level emergency, the Incident Commander could direct the activation of one or more of the following Emergency Operation Centers (EOC), which serve as the central locations for the President’s Cabinet and Crisis Response Team.

When activated, the President’s Cabinet or Crisis Response Team members report to their designated Emergency Operation Centers. These teams can be activated to support campus-wide incidents or to support city/region-wide incidents.

The **President’s Cabinet** makes policy decisions; the designee in Marketing and Communications manages the development of the content and the dissemination of information, as appropriate, to the media and the university community.

When the **Crisis Response Team** (CRT) assembles in its PC under the leadership of the CRT Chair, its responsibilities are to:

- Determine and update information regarding the scope and impact of the incident
- Prioritize emergency actions
- Deploy and coordinate resources and equipment
- Communicate critical information and instructions through the appropriate command chain and to the President’s Cabinet

- Monitor and re-evaluate conditions
- Coordinate actions with government agencies

Evacuation Procedures Overview

In order to ensure an orderly evacuation process, this plan was developed to supplement the Emergency Plan and provide enhanced procedures for select NUNM staff.

Management-level positions in the evacuation process are filled by pre-designated staff who will receive yearly training. Many other positions including, Physicians, Door Monitors, Missing Persons Coordinators, and Service Assistants are assigned early in the evacuation process and within the scope of the persons' knowledge and ability.

This section gives a brief overview of the evacuation procedures, which are laid out in further detail later in this document.

1. An emergency occurs that requires evacuation (e.g.: fire, earthquake, utility service malfunction etc.).
2. Depending on the type of incident, the Incident Commander (or designee) will order an evacuation of one or several buildings.
 - a. In cases where the fire alarm sounds, immediate evacuation is expected.
 - b. If an earthquake occurs, take cover and then evacuate when safe to do so.
 - c. If an active shooter incident occurs, the Evacuation Assembly Point will be the Helfgott building and the below evacuation procedures are not to be followed. The Crisis Response Team, outlined in the Emergency Response Plan, will be activated and follow a separate set of guidelines.
3. Each building's Zone Warden will be responsible for assisting in the successful evacuation of their building. Zone Wardens will take the Evacuation Binder (centrally located within their building) and notify people in the building to evacuate. They will then proceed to the Evacuation Assembly Area, where they will stand near their building's assembly area sign and gather information on the actions being taken within their evacuee group.
 - a. The Zone Warden will assign Door Monitors and Missing Persons Coordinators positions to available staff.
 - i. Door Monitors will stand by each entrance to the building to prevent persons from returning prior to the all-clear. They will also direct evacuees to the Evacuation Assembly Area.
 - ii. Missing Persons Coordinators will document evacuees' names and take reports of missing persons.
4. The Evacuation Manager will oversee the overall response and ensure that the Zone Warden and Service Assistants positions are filled.
 - a. The Evacuation Manager will instruct Service Assistants to shut off utilities when necessary, as well as identify hazards and assist with the general response planning and implementation.
5. The Assembly Area Manager will ensure that the assembly area is properly set up and monitor the activity of the Missing Persons Coordinators and Door Monitors.
 - a. As possible missing persons are identified, the Missing Persons Coordinators will report the information to the Assembly Area Manager who will decide on the best course of action.

6. The Casualty Area Manager will set up the Casualty Area and ensure the proper amount of resources and physicians are available to treat evacuees.
7. Throughout the incident, Evacuation Team members will notify their superior about emergency- related concerns and share intelligence relevant to the evacuation.
8. When the Incident Commander indicates it is safe to re-enter the building, Evacuation Team members will finish documenting their activities, gather any forms to be handed into the Evacuation Manager, and clean up their area.
9. Evacuation Team members will complete an Incident Form (via the NUNM website) within 24 hours.

Emergency Drills

The Director of Security will organize at least one emergency drill per a year. These drills may be announced or unannounced. Drill participation may vary from being limited to the Emergency Response Team to the entire campus community. Tabletop drills will typically only include the Emergency Response Team. Prior to any emergency response drill, the Emergency Response and Evacuation Plans will be sent to all participants. After a drill is completed, a debriefing will take place to evaluate the effectiveness of the procedures and identify areas requiring improvement. The records for emergency response drills are kept within the Office of Public Safety and Security.

Sexual Assault, Domestic Violence, Dating Violence and Stalking Policies

Prevention and Awareness Programs

The university, in cooperation with the Office of Student Life and the Office of Public Safety and Security, conducts campus safety programs. The campus safety programs are designed to inform and educate the campus of various ways to avoid, interrupt, and address safety issues on campus, including bystander intervention, reporting of violent crimes, and personal safety measures. The campus safety programs address domestic violence issues. These include providing education regarding the prevention of, and training related to, domestic violence, sexual assault, and dating violence and stalking, which are required by Title IX laws and the Campus SaVE (Sexual Violence Elimination) Act. The educational outcome of the events is to help members of campus develop an understanding of how to prevent these issues from occurring, how to intervene if you witness an event occurring, and information about how to recognize and reduce signs and of violence. These programs occur annually and are open to all community members.

Additional actions or programs take place throughout the academic year and range from posters or flyers distributed around campus to intra-community discussions.

Reporting Procedures

All NUNM students, faculty and staff are responsible for respecting the rights of one another. No NUNM student, faculty, staff, administrator or board member is exempt from this policy.

Any student, staff or faculty member who believes that they are being subject to, or may be subjected to, sexual harassment, discrimination or misconduct should immediately report it to any one of the following: Dean of Students, Vice President of Human Resources, Director of Security, or a program dean. Reports can also be filed online at https://NUNM-advocate.symplicity.com/public_report/.

NUNM will investigate situations in which an NUNM community member suspects that discrimination or harassment may be occurring, even if no one has made an individual complaint. Any findings of discrimination or harassment could result in disciplinary sanctions for those found to be violating university policy.

To ensure a prompt and effective response to allegations of sexual harassment and sexual violence, complaints will be investigated and conducted in a fair and equitable manner. Although confidentiality cannot be guaranteed, complaints will be handled as discreetly and confidentially as practicable. If the university determines that there has been a violation of this policy, appropriate corrective or disciplinary action will be taken for all parties involved, up to and including expulsion.

Reporting to the Portland Police is NOT required of any victim of sexual assault, domestic or interpersonal violence—with the exception of child or elder abuse. However, reporting to the Portland Police is always an option. The NUNM Public Safety and Security department can also assist people by notifying the Portland Police or applicable law enforcement agency.

In most cases, the university will not wait until a criminal case is resolved before proceeding with the case. In addition, if a university official has a reasonable belief that a crime has been committed, she or he may be obligated to report that to law enforcement, if police have not already been notified. In cases in which a police investigation has been conducted or is being conducted, law enforcement may be able to provide some information to the Title IX Coordinator. The university's fact-finding investigation may be delayed for a short period of time upon a request from law enforcement, but the university will promptly resume the investigation as soon as possible. Most sexual violence or sexual harassment investigations take up to 60 days to be resolved, depending on the complexity of the case and the number of parties involved. The university will keep a complainant advised as to the status of the case as the complainant desires and as is reasonable. In addition, the complainant has the right to be informed in writing about the outcome of the case.

Any reports of sexual misconduct toward, or of, a minor MUST be reported directly to the Office of Public Safety and Security and/or the Portland Police Bureau immediately. There are no exceptions to this policy. The Portland Police Bureau's non-emergency phone number is: 503.823.0000.

Investigative Procedures for all Clery Reports

Any Clery Act reports made that are considered to be sexual assault, sexual harassment or consist of/ involve sexual violence will be investigated according to Title IX Policy and Procedures. When the reports meet the department of education standards and definition for a Title IX complaint, these reports will be investigated via the formal investigative process (<https://nunm.navexone.com/content/docview/?docid=765&public=true>). In order for a report to be considered an official Title IX complaint, they must meet the following four standards:

- The complaint/incident must be persistent
- The complaint/incident must be pervasive
- The complaint/incident must take place in spaces considered campus property
- The complaint/incident must take place in the United States

All other Clery Reports made that are reported as sexual assault, sexual harassment or involve sexual violence that do not meet the department of education's definition of Title IX will be investigated via the informal investigative process (<https://nunm.navexone.com/content/docview/?docid=765&public=true>) All other Clery Reports made that are considered non-sexual will be investigated by the Responding to Reports of Discrimination and Harassment (non-sexual) policy and procedures (<https://nunm.navexone.com/content/docview/?docid=762&public=true>).

Importance of Preserving Evidence

When considering whether to report an alleged criminal offense, it is important to attempt to preserve evidence related to the crime as much as possible. Properly preserving evidence may be helpful in proving an offense occurred as well as obtaining a restraining order. NUNM has a Sexual Assault Nurse Examiner (SANE) on staff who can assist victims by completing an examination and documenting the appropriate evidence. Many SANE professionals are also available throughout the Portland metro area and at most hospitals. If able, clothing or other linens used or worn during an alleged criminal offense should be kept, unwashed, and in a paper bag. Time can also be a factor when preserving evidence. The sooner an alleged crime is reported the sooner evidence can be collect by law enforcement officials and maintained in a manner consistent with legal standards.

Confidentiality

Most reports are kept private unless the Title IX Coordinator determines there is a risk of safety to student and/or campus community. Confidential reporting is only available during client/therapist meetings at the Counseling Center and during patient visits at the NUNM Health Centers. NUNM will take into account the complainant's individual wishes regarding inquiries/investigations to the greatest extent possible.

For the purpose of generating this and subsequent Clery Act reports, no personally identifiable information will be disclosed.

Informed Consent

NUNM's responsibility is to care and protect NUNM community members from sexual assault and misconduct. Received reports will be summarized and submitted to the Title

IX Coordinator. The reporting individual will be invited to consider whether or not they would like names to be included in the summary, allowing them to determine the level of anonymity within the report summary.

Written Notifications

NUNM will provide written notifications to victims about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to victims, both within the institution and in the community. This information will be made available for students through the Office of Student Life and for employees through the Human Resources Department.

NUNM will provide written notification to victims about available options and assistance relating to the following: academic situations, living situations, transportation arrangements, working situations, and protective measures. This information will be made available for students through the Office of Student Life and for employees through the Human Resources Department. All reasonable accommodations or protective measures are made available to a victim upon request, regardless of whether a victim has made a report to local law enforcement.

A notification of a student's or employee's rights and options will be issued to victims following a report of dating violence, domestic violence, sexual assault or stalking, regardless of whether the offense occurred on or off campus.

Disciplinary Procedures

In situations in which an NUNM community member suspects that an incident of discrimination, harassment, domestic violence, dating violence, sexual assault, or stalking may be occurring, even when no one has made an individual complaint, NUNM is obligated to do a primary fact-finding inquiry. The purpose of the inquiry into the incident is to assess if there is enough information to warrant a further, more comprehensive investigation and to provide immediate remedies and support. Any findings could result in disciplinary sanctions for those violating policy.

NUNM will take remediated actions during the inquiry and investigation for all community members. For students, this may include interim suspension, changes to student course/lab sections, no-contact orders, etc., pending the results of the investigation.

NUNM uses a preponderance of evidence or a "more likely than not" standard in determining if sexual misconduct has occurred.

Complaints will be promptly investigated and conducted in a fair and equitable manner. Although confidentiality cannot be guaranteed, complaints will be handled as discreetly and classified as practicable. The complaint and respondent(s) participating in an inquiry or investigation may have an advisor or advocate of their choice during the interview process. Advisors sole purpose during the investigation process is supportive in nature.

Advisors are not allowed to speak or otherwise participate in the proceeding or investigation.

A hostile environment caused by sexual harassment is assessed using the perspective of a “reasonable person,” which is defined as a person who would act or feel the same as the person claiming the hostile environment, considering all the circumstances. The more severe the conduct that interferes with or limits the complainant’s ability to participate or benefit from educational programs, the less need is required to show a repetitive series of events to prove a hostile environment caused by sexual harassment. This is particularly true if there is conduct of a physical nature. Therefore, a single or isolated incident of sexual violence may create a hostile environment.

When assessing if sexual misconduct has occurred, NUNM will use the following three thresholds in its determinations. Sexual misconduct will be considered occurring if one or more of the following threshold have been met: consent, incapacitation and force.

1. Consent has not been given as defined in Section 13.3 of the Student Handbook;
2. Incapacitation:
 - a. Incapacitation is defined as the state of a person who is in a diminished capacity and receiving harm. Examples would be:
 - i. Too drunk or drugged (examples: Blackout or completely out of it, vomiting, inability to walk)
 - ii. Lacking the capacity to give reasonable consent due to mental or physical disability
 - iii. Under the age of 18 (State of Oregon statute)
3. Force:
 - a. Force in terms of sexual misconduct is defined as unlawful affect or control over someone involving violence or threat. Examples of force would include:
 - i. Threat: Overtly doing or saying whatever is needed in order to get a person to do what you want them to do when they have stated otherwise. Feeling as if harm will be done if the person doesn’t go along with the request.
 - ii. Intimidation: An implied threat,
 - iii. Coercion: The pressure to have sex with someone: an unreasonable application of pressure. Coercion is measured in terms of:
 1. Intensity: HOW was the pressure used
 2. Frequency: how OFTEN was the person asked
 3. Duration: How LONG had the person been asking
 - iv. Isolation: Attempting or complete separating a person from others.

During the incident review and/or investigation, it may be determined that a no-contact order may be put in place as an immediate remedy for an ongoing review. A no-contact order prohibits the accuser and accused from having any contact with one another until the no-contact order has been lifted.

Contact includes, but is not limited to:

- Intentional visual or physical presence of the other person;
- Communication with the other person in any written form, including handwritten notes, electronic mail or text messages;
- Communication with university*, business or government entities with the intent of affecting some right or interest of the other person;
- Communication with the other person through a third person; and/or
- Committing a crime against the other person or their property

*Exception: Both involved parties may communicate with university staff who “have a need to know” about the university no-contact order and other legal documents, such as a restraining/stalking protective order. All students are allowed advocates, of their choice, to be present during the investigative process.

Outcome of Investigation

If the university determines that there has been a violation of this policy, it will take reasonable, timely and effective corrective action, including steps tailored to the specific situation for all parties involved, up to and including expulsion or termination of employment. Both the accused and the accuser will be notified in writing regarding the investigation outcome via a Findings and Determination Report. This will be issued at the conclusion of the investigation. The fact-finding investigation; the investigation outcome and determinations; and the plan to eliminate, remediate and prevent reoccurrence, including sanctioning, normally conclude within a 60-calendar day period. If an investigation process is anticipated to exceed the normal 60-calendar day period, both parties will be notified of the delay, reasoning, and an anticipated completion date.

Both the accused and the accuser have the right to appeal the sanctions of the Findings and Determination Report as described below.

Appeal Procedure for Sexual Misconduct

When the outcome of an investigation results in a violation of the sexual misconduct policy, the sanctions (only) may be eligible for an appeal by accused student(s). In addition, the complainant has

the same right to appeal as the respondent. Based on the Findings and Determination Report, student(s) found to be in violation of the sexual misconduct policy or the complainant, have three options:

1. If the student accepts the findings and determination, then an appeal is unnecessary. All sanctions outlined in the final determination letter will be in place with outlined completion dates.
2. If the student accepts the findings and determinations in part, but disagrees with other parts, the student is entitled to a formal hearing process to address the contested pieces. Only the contested sanctions of the agreed upon findings and determinations are appealable.
3. If the student rejects the findings and determinations in its entirety, the student is entitled to a formal hearing process with access to any

information that will be sent to the hearing board.

Both the respondent and complainant will receive a simultaneous written notification of the decision within five (5) business days of the appeal hearing.

Formal Hearing

An accused student who has been found in violation of sexual misconduct, who rejects part or all of the final Findings and Determination Report sanctions, has a right to a formal hearing process. In addition, the complainant has the right to appeal. The hearing board is composed of the chair of the Honor Council and two other trained Title IX investigators. Only sanctions are appealable. All outcomes of the formal hearing process are final and may not be appealed.

During a formal hearing, the Findings and Determination Report will be shared with the hearing board. The investigators will present the case on behalf of the complainant, unless the complainant specifically requests to present on their own behalf. The hearing board will have the right to question both the investigators and the respondent. If witnesses are allowed, they will also be questioned. The hearing board will use the "Preponderance of Evidence" standard and make final findings and determinations. The hearing board's decisions are final and not subject to appeal.

Amnesty Provision

In order to encourage proper and timely reporting of sexual assaults, NUNM will not adjudicate or sanction the victim of the alleged assault/harassment for the admitted use of alcohol or drugs in the course of events of the alleged interaction, which otherwise may have been found in violation of campus policies, if the person reports being a victim of sexual assault/harassment and reports the incident to one or more of the following administrative staff members: Dean of Students; Vice President of Human Resources; Associate Vice President of Institutional Effectiveness; Director of Security; or a program dean.

Retaliation

The university expressly prohibits retaliation, defined as any intentional or adverse action, taken against any individual who in good faith brings a complaint to the attention of the university or who participates in any resulting investigation. Any act of retaliation that is directed against a complainant, respondent, witness or participant in the process, by any party, will be treated as a separate and distinct charge. If the university determines that a student, staff or faculty member has engaged in retaliation, appropriate corrective or disciplinary action will be taken, up to and including expulsion. In addition, the university will not retaliate against anyone who brings forth a Title IX complaint with the school, or any state or federal agency; or for participating in an investigation or proceeding.

If any person feels that their rights may have been violated, they may contact the Office

for Civil Rights (OCR) regardless of whether they have chosen to work or not work with NUNM to correct the issue.

Information regarding OCR complaints can be found at: www2.ed.gov/ocr/complaintintro.html.

Sex Offender Registration

Information regarding registered sex offenders is available through the Oregon State Police.

Standard of Evidence

A determination of responsibility is based on preponderance of evidence “more likely than not” that conduct constituting a violation occurred or that it did not occur.

Permissible Disciplinary Sanctions

One or more of the following sanctions may be imposed upon any student for any single violation of the Code of Conduct or Honor Code. Sanctions may be imposed separately or in conjunction with any other sanction(s). Additional or alternative sanction may be imposed as deemed appropriate to the offense with the approval of the Dean of Students or designee.

Reprimand/Warning

A reprimand/warning will be a written sanction warning that future conduct, which violates the proscriptions of the Code of Conduct or Honor Code, may result in consideration of increasingly severe sanctions. The official copy of this reprimand shall be kept by the registrar in the student’s official file throughout a student’s tenure, and until one year after the student has graduated from, or otherwise permanently left NUNM.

Restitution

Restitution may be sanctioned in cases involving damaged, stolen or misappropriated property (including money). This could include situations such as failure to return a reserved room/space in proper condition. This is not a fee/fine but, rather, a repayment for labor costs and/or value of property destroyed, damaged, consumed or stolen.

Counseling

This sanction may be fulfilled upon the approval from the Dean of Students, a licensed mental health provider of the student’s choosing. The sanction letter will identify the specific ends to be achieved as a result of counseling, and the time period within which these ends are to be realized.

Community Service

A student or student club/organization may be required to complete a specific supervised university or community service. Community education hours will not be issued for any sanctioned community service.

Confiscation of Prohibited Property

The presence on campus of items that are in violation of NUNM policy will be confiscated and will become property of the university. Prohibited items may be returned to the owner at the discretion of the Dean of Students and/or the Office of Public Safety

and Security.

Loss of Privileges

A student or student club/organization may be denied specified privileges for a designated period of time.

Behavioral Contract

This pertains to required activities including, but not limited to, seeking academic counseling, professional development advising, mental health counseling, substance abuse screening, writing a letter of apology, etc.

Educational Program

Requirement to attend, present and/or participate in a program related to the violation. It may also be a requirement to sponsor or assist with a program for others on campus to aid them in learning about a specific topic or issue related to the violation for which the student or student club/organization was found responsible. Audience may be restricted and reason for participation will not be advertised.

Eligibility Restriction

This sanction deems a student “not in good standing” with the university for a specific period of time. During this time, the student has specific limitations or exceptions in place that restrict the ability to represent the university. This conduct sanction may include, but is not limited to, the following:

- Ineligibility to hold any office in any student organization recognized by the university, or hold an elected or appointed office at the university; or
- Ineligibility to represent NUNM to anyone outside the university community in any way, including: presenting community education opportunities, attending non-required conferences, representing the university in official capacity at a function or gathering, etc.

Exclusion from Campus

A written notice issued as a means of intervention to direct disruptive persons away from parts of, or the entire, campus; and to provide protection, safety and security for the welfare of the students, faculty, staff and guests of NUNM.

Disciplinary Probation

This sanction permits the student to remain at NUNM with the stipulation that the student avoids further violations of the Code of Conduct and/or the Honor Code. In appropriate cases, additional conditions of probation may be imposed when the circumstances of the student’s misconduct do not warrant suspension. A probationary period will be delineated. If a student is found to violate the Code of Conduct or Honor Council while on probation, the student may face suspension or expulsion.

Clinical Probation

Clinical probationary status allows a student a 30-day opportunity to correct behaviors that have been identified as being problematic. If, after 30 days, the student has demonstrated improvement, the Dean of Students, program dean, or Chief Medical

Officer may elect to remove the student from clinic probation. If, after the initial 30-day probationary period, the student has not demonstrated improvement, the Dean of Students, program dean, or Chief Medical Officer may elect to either extend the student's probation for an additional 30 days or to suspend the student from clinic. In the circumstances of probation, NUNM's absence policy still applies. If a student has more than two absences while on probation, then a grade for that rotation may not be earned. In addition, current add/drop policies and fees may be applied.

Clinical Suspension

Clinical suspension is an involuntary removal from all clinical rotations, patient care, or contact. During a clinical suspension, the student will be referred through the conduct hearing process, which could include additional sanctions, including but not limited to, suspension. In the circumstances of clinical suspension, NUNM's absence policy still applies. If a student has more than two absences while on probation, then a grade for that rotation may not be earned. In addition, current add/drop policies and fees may be applied. Clinical suspensions may not be appealed.

Interim Suspension

This sanction imposes actions that can include separation from the institution or restriction on participation in the community for no more than ten (10) business days pending the scheduling of the NUNM Honor Council on alleged violation(s) of the Code of Conduct, Honor Code, or other policy violation.

A student who receives an interim suspension notification may request a meeting with the Dean of Students (or designee) to discuss the reason(s) and terms for the interim suspension. This meeting does not supersede the Honor Council hearing.

During an interim suspension, as determined by the Dean of Students, a student may be denied access to NUNM campus/facilities/events, and the NUNM Health Centers. This restriction may also include classes, university activities, and/or privileges for which the student might otherwise have been eligible. At the discretion of the Dean of Students, and in collaboration with and approval from the appropriate dean(s), alternative coursework options may be allowed to minimize the impact on the student's academic progress.

Suspension

Suspension is an involuntary dismissal from NUNM and terminates the student's rights and privileges at the university. Suspensions take effect immediately and may include the current term of enrollment.

During the suspension period, the student is banned from university property, NUNM Health Centers, functions, events and activities without prior written approval from the Dean of Students. This sanction may be enforced with a trespass restriction, as necessary. Eligibility to return from suspension or reapply to NUNM may be contingent upon satisfaction of specific conditions noted at the time of suspension. If the suspension is for one (1) calendar year or more, reapplication for admission is required.

Potential re-admittance to campus depends on the nature of the underlying incident, as well as the circumstances of the student's actions since suspension. Re-admittance also is based on the student's ability to contribute to the NUNM community without detrimental behavior. In addition, the student will need to comply with all admissions procedures and requirements established by NUNM. If sanctions are imposed as a condition of re-admittance, the student must also comply with any stipulations of that sanction before re-applying to NUNM. Re-admission to NUNM is not guaranteed. See Section 14.13 of the Student Handbook for the re-admission policy.

If a student is allowed re-admittance to the university, the student will be placed on disciplinary probation for the remainder of his/her NUNM career.

Upon suspension, fees will be refunded in accordance with the refund schedule.

Expulsion

Expulsion terminates the individual's rights and privileges as a student of NUNM permanently. The individual may not apply for re-admittance to NUNM and is banned from university property, functions, events and activities.

This sanction will be noted as a Conduct Expulsion on the student's official academic transcript.

In addition to the above, any of the following sanctions may also be imposed upon student groups or organizations found to have violated the Code of Conduct or Honor Code:

- Deactivation, loss of recognition, and all other privileges (including status as a university registered group/organization) for a specified period of time.

Range of Protective Measures

NUNM will take remediated actions during the inquiry and investigation, which may include interim suspension, change student course/lab sections, no-contact orders, etc., pending the results of the investigation.

Prompt, Fair, Impartial Process

In situations in which an NUNM community member suspects that an incident of discrimination, harassment, domestic violence, dating violence, sexual assault, or stalking may be occurring, even when no one has made an individual complaint, NUNM is obligated to do a primary fact-finding inquiry. The purpose of the inquiry into the incident is to assess if there is enough information to warrant a further, more comprehensive investigation and to provide immediate remedies and support. Any findings could result in disciplinary sanctions.

To ensure a prompt and effective response to allegations of sexual harassment and sexual violence, complaints will be investigated and conducted in a fair, and equitable manner. Complaints will be promptly investigated and typically concluded within 60 calendar days of receiving the initial report.

Disclosures to Victims of Violent Crimes and Non-Forcible Sex Offenses

NUNM will, upon written request, disclose to the alleged survivor of a crime of violence (as 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 NUNM against a student who is the alleged perpetrator of such crime or offense. If the alleged survivor is deceased as a result of such crime or offense, the next of kin of such survivor shall be treated as the alleged victim for purposes of this paragraph.

Drug and Alcohol Policies

Drug-Free Schools and Communities Act, Drug-Free Workplace Act, and Oregon Health Authority NUNM is committed to providing a drug-free environment. Alcohol and/or drug abuse compromises the student's ability to learn and to practice as a health provider, and thus is considered unprofessional conduct. NUNM is legally required and professionally committed to prevent illicit or recreational drug use and the abuse of alcohol by both students and employees (in compliance with the Drug-Free Schools and Communities Act, as amended by Public Law 100-297; the Improving America's Schools Act of 1994, Public Law 103-382; the federal Drug-Free Workplace Act of 1988; and the Oregon Health Authority and Oregon Administrative Rules 409-030-0100).

Illicit Drug and Alcohol Policy

Students are prohibited from unlawfully possessing, using or distributing, or being under the influence of or inebriated by alcohol or drugs (whether prescribed, illicit or recreational), or any other intoxicant on university property or at any university event. The sale or transfer of prescription and look-alike drugs is also a violation of university policy. Students and employees are also prohibited from consuming alcohol or drugs on campus or at NUNM-sponsored events (except when the event is authorized by special permit; see the Exemption Request for Alcohol at University Events and Receptions policy), or from being on university-controlled property while under the influence of alcohol or intoxicants. In addition, students may not attend class or clinic under the effect of alcohol or drugs. Violation of this policy by a student will result in sanctions up to, and including, suspension or expulsion from NUNM, and referral for prosecution for violation of local, state and federal laws. If state and federal law differ in establishing which drugs are illegal, NUNM follows federal law in determining whether a substance is illicit.

Any student found in violation of this policy may be subject to sanctions as set forth in the Student Conduct Code.

Drugs/Intoxicant Violation

Any student believed to be under the influence of or inebriated by alcohol or drugs (whether prescribed, illicit or recreational), or any other intoxicant, may be required to undergo a rapid urinary drug screen (RUDS). If the RUDS is found to be positive, the results will be confirmed by a second testing method completed at a DHHS-certified lab.

If this testing also shows “positive,” the student will be removed from the class or clinic shift and subject to sanctions as set forth in the Code of Conduct.

If the RUDS demonstrates the presence of a prescription drug, a valid prescription for the drug must be provided, and disciplinary measures may be invoked if the student is visibly inebriated or suffering cognitive impairment while on the medication.

The university’s initial and foremost response to reported or observed violations is counseling in conjunction with other disciplinary actions.

Alcohol Violation

Any student that NUNM has reasonable grounds to believe is intoxicated will be required to undergo a blood alcohol test administered at a facility designated by NUNM. Refusal to take this blood alcohol test can result in immediate suspension from NUNM. *If the student is working a clinic shift, having a test that shows any alcohol in the student’s system will result in his/her immediate removal from the clinic shift and will be subject to sanctions as set forth in the Code of Conduct.*

Legal Consequences

There are both state and federal sanctions regarding the possession or distribution of illegal drugs. Oregon has strong laws that allow the seizure and forfeiture of vehicles used to transport illegal drugs by law enforcement agencies. Alcohol is an illegal drug for those under 21. For drivers under 18, any detectable amount of alcohol is grounds for losing an operator’s license until age 18. Many recreational drugs are illegal, and criminal conviction may bar a student from their chosen career path.

Education and Rehabilitation

Students having difficulty with alcohol and/or drugs are encouraged to seek appropriate counseling. In addition, in compliance with federal law, NUNM is prepared to educate and inform its students and employees of the health risks associated with the use of various illicit drugs and the abuse of alcohol. NUNM is also prepared to refer students to counseling and treatment resources, and to inform students of legal penalties of noncompliance. Students are encouraged to avail themselves of an appropriate counseling, treatment or rehabilitation program. NUNM aims to share concern for those struggling with substance abuse and support their decision to enter counseling or recovery programs. Even so, drug and/or alcohol use and abuse is not tolerated on campus because of the inevitable effects on others.

Resources concerning treatment and rehabilitation programs are available in the Office of Student Life. University officials may consider a student’s participation in such a program when applying sanctions for violations of this policy.

Drug Testing

In compliance with the Oregon Health Authority and Oregon Administrative Rules 409-030-0100, as of July 1, 2015, all incoming students are required to undergo a drug screen

prior to matriculation at NUNM. Students enrolled prior to July 1, 2015, are required to undergo a drug screen prior to any clinical rotations or fieldwork experience.

Incoming students must submit a urine sample at a Department of Health and Human Services (DHHS)- certified lab in the 30 days prior to the beginning of their NUNM matriculation date. Refusal to take the required substance test will result in a revocation of the offer of admission to NUNM. The student will forfeit the enrollment deposit. Students are responsible for paying for the drug screening when they arrive at the lab.

Currently enrolled students may be required to undergo a drug screening prior to their first clinical rotation or fieldwork experience. Refusal to take the required substance test may result in an interim suspension from NUNM and will prohibit the student from participating in clinical rotations or fieldwork at NUNM or any of its affiliates, and a referral to Honor Council

The 10-panel urinary drug screen must include the following eight substances: amphetamines, including methamphetamines; barbiturates; benzodiazepines; cocaine; marijuana; methadone; opiates; and phencyclidine.

For incoming students, a refusal to take the required substance test may result in a revocation of the offer of admission to NUNM. For current students, a refusal to take the required substance test may result in an interim suspension from NUNM, which prohibits the student from participating in courses, clinical rotations, or fieldwork at NUNM or any of its affiliates.

Drug Screening Results for Current Students

A drug screen is considered void for students whose urinary drug screen is “dilute-positive,” “dilute- negative,” “positive” or “invalid” in any way. The student is responsible to take a subsequent drug test within 30 days of the void result. The student will be put on interim clinical suspension until a negative drug result is received. Failure to complete a subsequent urinary drug screen within this time period will result in clinical suspension and a referral to Honor Council.

Refusal to take the required substance test may result in an interim suspension from NUNM and will prohibit the student from participating in classes, clinical rotations, or fieldwork at NUNM or any of its affiliates.

All positive results are sent to a Medical Review Officer (MRO), an independent third-party licensed physician who is responsible for receiving and reviewing lab results generated by the urinary drug screen process. The MRO will contact only those students who produce something other than a negative result. Any prescribed medications that may appear on the 10-panel urinary drug screen can be submitted to the MRO. *NUNM does not accept medical prescriptions for marijuana.*

Possession of marijuana, in any quantity, on any NUNM property or during classes, clinical rotations or fieldwork, is against NUNM policy and violates federal law. In addition, failure to comply with federal laws and regulations concerning marijuana possession and its use on campus, jeopardizes the university's continued receipt of federal funds. Thus, NUNM does not accept medical prescriptions for marijuana.

Costs

Students are financially responsible for all drug screening fees. For current students, the lab fee for the urinary drug screenings is added to each student's account.

Record Retention

The Office of the Chief Medical Officer will maintain a database documenting that the student has complied with all clinical entry requirements stipulated in OAR 409-030-0100.

This information can be shared with affiliated hospitals, clinics and fieldwork sites that request this information to assure the student has met clinical entry requirements, including drug screening.

Students who wish this information to be released to affiliated hospitals, clinics and fieldwork sites, can submit a "Release of Information" form to the Chief Medical Officer's Office.

If a student receives a positive result from drug screening, the report will be forwarded to the Dean of Students for review and referral to the Honor Council.

Policy Review

NUNM's Drug and Alcohol Abuse Program is reviewed biennially to determine its effectiveness. Changes are made as appropriate, and the president ensures that these disciplinary sanctions are consistently enforced.

Exemption Policy for Request for Alcohol at University Events and Receptions

NUNM complies with the Drug-Free Work Act of 1988, the Drug-Free Schools and Communities Act of 1989, and State of Oregon laws. NUNM prohibits the consumption or distribution of alcohol on university properties, whether or not it is an NUNM-sponsored event, and at off-site university sponsored events.

If an event-sponsoring organization or department would like to request an exemption to the no alcohol policy, they may petition the appropriate office for exemption by submitting an "NUNM Alcohol Use Permit" form. *This applies to all university-sponsored events, on or off campus.*

Consideration for exemption to this policy must be made no less than two (2) weeks prior to the event date to the appropriate office, and if approved, all delineated requirements must be met.

Prior to petitioning for exemption, persons or organizations wishing to have an event with alcohol must designate an event host. The event host is responsible for the overall management of the event, as well as compliance with city, state and federal laws, and NUNM policies. The event host shall read, understand and agree to all policies and procedures, as well as submit the “NUNM Alcohol Use Permit” form for approval a minimum of two (2) weeks prior to the event.

All requests for exemption for alcohol require at least three signatures for final approval. In cases of events at which students are present, approval is required by the Dean of Students (or designee); in cases of institutional or departmental events at which staff or faculty are present, approval by the Vice President of Human Resources is required. If students and employees are present, both the Vice President of Human Resources and the Dean of Students (or designee), must approve the form. In cases of non-NUNM events, approval is required from the Vice President of Finance and Administration (or designee). The Office of Public Safety and Security, and the Office of the President must also sign off on all petitions for final approval. Any violations of these requirements, or the regulations and policies outlined below, will result in NUNM disciplinary actions.

In addition to federal and state laws, the following regulations and policies shall be enforced when alcohol is present at any event.

1. No persons under the age of 21 shall possess or consume alcohol. All persons who attend the event must be prepared to show government-issued picture identification.
2. No student, employee or other person shall knowingly or intentionally furnish, sell, supply, give or provide alcohol to a person under the age of 21; or allow any person under the age of 21 to possess or consume alcohol.
3. No alcohol will be served to persons who appear to be intoxicated.
4. Non-alcoholic beverages, in addition to water, must be prominently displayed and available during the event.
5. No less than two different types of substantial food shall be served at each event, with food services beginning prior to the consumption of alcohol and continuing until the end of the event.
6. “Different” means food items that differ in their primary ingredients and/or method of preparation (i.e., cheese pizza and pepperoni pizza are different).
7. “Substantial” means food items prepared or cooked, and that are typically served as a main course or entrée (i.e., pizza and sandwiches are substantial, however, chips and popcorn are not).
8. Alcohol service must be discontinued no later than 30 minutes prior to the end of the scheduled event.
9. Alcohol must be served by servers who hold current servers licensing, and only servers may serve alcohol. Receptions that are limited to less than 10 people and are closed, invitation-only events, do not require a

licensed alcohol server. However, the event host is responsible for compliance with all laws and policies. Self-service and bring your own (BYO) is not permitted.

10. Servers will not consume alcohol while working, nor serve more than one alcoholic beverage to a single person at one time.
11. NUNM employees shall not consume alcohol unless they have completed their normal work schedule. This is in compliance with the Drug-Free Workplace Act.
12. Sponsoring groups that wish to provide alcohol at events sponsored by the university or on university property, must designate an event host. The event host is responsible for the submission of the "NUNM Alcohol Use Permit" form for approval to the approving body no fewer than two (2) weeks prior to the event. Failure to comply with the deadline may result in the permit being denied.
13. The event host may not consume alcohol during the event to ensure all policies, procedures, regulations and laws are being followed.
14. No alcohol will be sold on university properties unless the events are catered through food service and have been approved through the NUNM process. NUNM does not hold a liquor license. The food service provider must apply for and receive a temporary sales license through the Oregon Liquor Control Commission (OLCC). Events where donations or tickets are required for alcohol/entry to the event, or if alcohol is being raffled as a prize, an OLCC liquor license is required.
15. Alcohol on university property will be limited to beer, wine and champagne only. No hard liquor or distilled spirits are allowed.
16. No student activities money shall be used for the purchase of alcohol without the approval of the Dean of Students; whether the event is on or off campus.
17. No alcoholic beverages shall be served at university student recruitment functions.
18. Publicity of events should focus on the entertainment, speeches, presentations and/or other activities, and should not focus on alcohol. Advertisements cannot mention alcohol as a means of promoting an event.
19. Alcoholic beverages must be consumed in the designated event area(s) and must not leave the university property.
20. Alternative transportation options must be planned for and, if deemed necessary, provided by the event host to anyone who appears to be intoxicated. Alternative transportation fiscal responsibility belongs to the event host.
21. Security may be required at the event, especially if there are minors present for the event. Fiscal responsibility for security is the responsibility of the event host. Please contact the Director of Security to arrange for security for the event. Final approval for the event will not be granted until the Director of Security has given authorization.
22. *Failure to comply with all these established rules, regulations and laws will result in disciplinary action as delineated in the student*

and employee handbooks.

Review and approval of all submitted "NUNM Alcohol Use Permit" forms is the responsibility of the Dean of Students, Vice President of Human Resources, or the Vice President of Finance and Administration. If approved, the event host will then submit the form to the Office of Public Safety and Security for review and approval. If approved, the event host will then submit the form to the Office of the President for final approval. The form will be kept on file in the Office of the President with copies submitted to the approving bodies.

Missing Student Notification

The safety of NUNM students is critical and if a student is believed to be missing, immediate steps will be taken to locate the student. A student may be considered missing if:

- The student is unreachable by phone, electronic communication (email, text, etc.), or in person for 24 hours or more when the student is otherwise expected to be on campus or at an NUNM-related clinic shift/activity; or
- The student has not reached their specified destination for 24 hours or more past their anticipated arrival time; or
- Other factors that lead NUNM staff to believe the student is missing.

If any of these circumstances lead to the belief a student is missing, an immediate investigation will be conducted and efforts will be made to reach the student in question. The following steps will be taken:

- Notification of the emergency contact listed in SONIS.
- Notification of the Portland Police Bureau with a request for a wellness check to the student's residence.

When the missing student is located, the CARE (Crisis Assessment and REsponse) Team will assess the state of health and safety of the student for his/her return to campus. If appropriate, a referral to the Counseling Center may be made.

If you believe a student is missing, please contact the Office of Student Life or Public Safety and Security immediately.

Students are required to submit a local address and emergency contact during orientation. *Students are strongly encouraged to periodically review and update their emergency contact and address information in SONIS.* If you have questions on how to update your information, please contact the Registrar's Office.

University officers may review student records on an as-needed basis. Personal information about students will not be shared with third parties on or off campus, except as directed in writing by the student, the courts or governmental agencies.

Crime Statistics

In compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, NUNM submits annual crime statistics. These are available at: <http://ope.ed.gov/security> and are printed below. The intent of the report is to inform you of the extent of reported crimes occurring in the previous calendar year. Crime statistics are prepared by NUNM’s Office of Public Safety and Security in cooperation with the Portland Police Bureau (PPB). Data is collected from a variety of sources, including Public Safety and Security’s internal incident reports, PPB reports, and campus security authorities.

Crime Statistics for the Previous Four Years

Classification	Year	On Campus	Public Property	Non-Campus
Murder/Non-Negligent Manslaughter	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Negligent Manslaughter	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Forcible Sex Offenses	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Non-Forcible Sex Offenses	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Robbery	2023	0	0	0
	2022	0	0	0
	2021	0	1	0
	2020	0	0	0
Aggravated Assault	2023	1	0	0
	2022	0	0	0
	2021	1	0	0
	2020	0	0	0
Burglary	2023	3	0	0
	2022	0	0	0
	2021	1	0	0
	2020	3	0	0
Motor Vehicle Theft	2023	1	0	0
	2022	1	1	0

	2021	0	0	0
	2020	0	0	0
Arson	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Domestic Violence	2023	0	0	0
	2022	0	0	0
	2021	0	2	0
	2020	0	0	0
Dating Violence	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Classification	Year	On Campus	Public Property	Non-Campus
Stalking	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Liquor Law Arrests	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Liquor Law Referrals	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Weapon Possession	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Weapon Possession Referrals	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Drug Law Arrests	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Drug Law Referrals	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
	2020	0	0	0
Hate/Bias Crimes	2023	0	0	0
	2022	0	0	0
	2021	0	0	0

	2020	0	0	0
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For the purposes of compiling these statistics, no reports were omitted due to being declared unfounded by a law enforcement official.

NUNM does not currently have residential facilities; this column has been omitted from the above table.

No hate or bias crimes have been reported for the last four calendar years. Such crimes would be described in narrative format below the table section for Hate/Bias crimes.

