

PEIRCE COLLEGE

ANNUAL SECURITY SERVICES REPORT

2024

2024 Peirce College Annual Security Services Report

The 2024 Peirce College Annual Security Services Report is made available to all students and employees in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Pennsylvania Uniform Crime Reporting Act and Chapter 33 of the Pennsylvania Code. All post-secondary institutions receiving federal funding are required to disclose campus crime statistics and security information. Each institution must:

- Collect, classify, and report crime statistics;
- Issue timely campus alerts providing members of the campus community with information necessary to make informed decisions about their health and safety;
- Establish procedures and policies and provide educational programs for students and employees regarding dating violence, domestic violence, sexual assault and stalking;
- Publish an annual security report and submit crime statistics to the U.S. Department of Education by October 1 of each year.

Please carefully review the information provided in this document, which reports on policies and data relating to the safety and security of the Peirce College Community. The 2024 Peirce College Annual Security Services Report is prepared under the direction of the Vice President Academic Affairs and Provost, and the Vice President, Finance and Administration, who oversees security services. Current and prospective students and employees are entitled to receive a print copy of this report upon submitting a request to the Associate Dean, Student Support Services, at 215-670-9251.

Peirce College Security

At our new campus at 1608 Walnut Street, Suite 1900, everyone's safety is of paramount importance. In a shared work/learning environment, adherence to safety procedures is critical to protect people from harm. As a tenant in a large building, our protocols are integrated with the requirements of the building owner to ensure a cohesive emergency response. All employees, students, contract workers, volunteers, and guests are responsible for adhering to the College's Campus Safety Procedures and in doing so, are expressing our core values of Collaboration and Excellence.

In March 2023, the College moved our main campus to **1608 Walnut Street**, where we now occupy the entire 19th floor. The 12,000 square-foot space allows Peirce to create a flexible, modern and modular space aligned with the evolving needs of our institution and our students. Peirce's new campus is located in a Center City landmark, the former Sun Oil Building, an Art Deco masterpiece that served as the headquarters of the Sun Oil Company from the building's opening in 1928 to 1971. It is listed on both the National Register of Historic Places and Philadelphia Register of Historic Places.

The new location provides more flex space to better meet the changing needs of our students and our institution, including instruction and administrative space, student services, hoteling and collaborative space. Public parking and access to mass transit is closer to the new campus, which also has higher retail foot traffic that offers increased visibility to working adults and the general public.

Campus Access/Office Hours

Peirce has adopted telecommuting as its primary workplace and continues to most classes and student support services online. The campus was designed and staffed to augment the remote workplace and online education.

Standard office hours are 8:30am to 5:00pm Monday through Friday with modified hours for classes and events as scheduled. The specific office hours for each week will be posted to the college's room reservation system. For information about reserving a room for a campus visit, meeting, or event, please refer to the Facilities website on the Intranet at **my.peirce.edu**.

For your safety, access to campus is permitted only during the published hours of operation. No one is allowed to be in the suite by themselves. Access requires at least 2 (two) people, one of whom is a Primary Emergency Warden.

Emergency Wardens

In compliance with the building's rules, Peirce College has appointed Emergency Wardens to act as coordinators in the event of an emergency. All individuals must follow the instructions of the Emergency Wardens. See table below for designated Emergency Wardens.

Primary	Facilities Technician	During standard business hours and modified for classes and events
Primary	President's Council Members	If Facilities Technician is not on-site
Secondary	Faculty	During class hours
Secondary	Deans, AVPs, and Directors	Assist Primary Warden when on-site
Aides	Designated as needed	Provide assistant to individuals during an evacuation

Standard Emergency Protocols

For all emergencies, call 911 and provide the following information:

- Your full name
- Phone number you're calling from
- The office address of 1608 Walnut Street, Suite 1900, Philadelphia, PA 19103
- Nature and severity of the situation
- Exact location of hazard or event

Then, call building management at 215-732-1544 and provide the same information.

Emergency protocols for different types of emergencies are described in **Appendix B**.

Timely Warning

In the event that a situation arises, either on or near campus, that, in the judgement of the College, constitutes an ongoing or continuous threat, a "timely warning" will be issued to all individuals in our suite through a verbal announcement, and second, an email and emergency text. Anyone with information warranting a timely warning should inform the Primary Emergency Warden and, if the threat is imminent, follow the Standard Emergency Protocols.

Emergency Response

For our campus, there are two responses to an emergency – shelter in place or evacuate. Shelter in Place means finding a safe location indoors and staying there until you are given an "all clear" or told to evacuate. You may be asked to shelter in place because of an active shooter, intruder, weather event, natural disaster, street incident or other hazard.

Evacuate means exiting the building using the stairs. You may be asked to evacuate due to a fire, intruder, active shooter, gas leak, natural disaster, building damage, or other hazard.

The Primary Emergency Warden in coordination with building management will determine the course of action and provide instructions.

At least bi-annually, the College will conduct testing of these emergency response procedures to practice and improve our protocols. The testing may be announced in advance or unannounced. These tests will be conducted in coordination with building management to ensure an integrated and cohesive plan.

Special Needs Assistance

If you have a temporary or permanent disability that may impair your ability to respond in an emergency, please inform a Primary Emergency Warden when you are on campus. To prepare for an emergency:

- Identify your Aid who will be able to help you evacuate using the stairs
- Practice drills, increase skills, and instill confidence in your ability to cope in an emergency
- Practice how to explain quickly to other people how they can assist you
- If you are hearing impaired, practice having co-workers communicate important information to you through gestures or text
- If you are vision impaired, practice having co-workers guide you

It is a good safety habit for everyone to carry emergency health information and emergency contact numbers at all times.

Weapons and Threatening Behavior

The College wants to create a safe, productive environment for everyone, and as such, threatening and dangerous behaviors are taken very seriously. At College facilities and at any off-site College-sponsored event, the following is strictly prohibited:

- Weapons are not permitted. A weapon includes guns, rifles, fireworks, knives, explosives, bombs, and any other similar items. Unloaded firearms are prohibited; even an individual possessing a weapons permit is not permitted to possess or conceal any type of weapon.
- Threats of harm, written or oral, expressed or implied
- Physically assaulting, attacking, or otherwise intentionally causing injury to anyone
- Threatening to cause damage or actually causing damage to the property of others

The College reserves the right to search any person on College premises at any time, including personal items such as handbags and backpacks. Please see the College's **Information Technology Acceptable Use Policy** regarding searches of College technology assets.

Security Measures

The primary security measure for our suite is the locked elevator. The elevator will not automatically rise to the 19th floor and only Primary Emergency Wardens have elevator fobs. The front desk in the building lobby has been instructed not to activate the elevator or escort anyone to our suite. Instructions for coming to our suite are provided to employees when reserving a room and to students at the beginning of an on-campus course. Anyone who comes to campus may be required to show a valid picture state identification, such as a driver's license, before being escorted by a College employee to our suite.

While the locked elevator and other safety measures provide a level of security, nothing is failsafe. We all must remain vigilant, prepared and thoughtful about our actions.

Accountability

The College takes its duty of care very seriously and expects that all employees, students, contract workers, guests, contracted and volunteers will adhere to these procedures. Because of the life/safety implications, employees and contract workers who fail to follow these procedures will be referred to Human Resources for disciplinary action. If a volunteer violates this policy, the employee responsible for managing the volunteer will be referred to Human Resources, and the volunteer will no longer be permitted to work with the college. A guest who violates this policy will not be allowed at any college event in the future. Students will be referred to the Dean, Academic Advising & Registrar. Based on the nature and severity of the infraction, the College may refer the matter to law enforcement for further action.

Questions should be directed to the Vice President, Finance & Administration. This policy will be reviewed periodically and may be revised without notice.

See **Appendix A** for a listing of Responsibilities of Emergency Wardens and **Appendix B** for Emergency Protocols for Different Types of Emergencies.

Crime Reporting & Statistics

The Clery Act requires post-secondary institutions to report the following categories of crime statistics:

- Criminal Offenses—Criminal Homicide, including Murder and Non-negligent Manslaughter, and Manslaughter by Negligence; Sexual Assault,2 including Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson;
- Hate Crimes—Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/ Vandalism of Property that were motivated by bias;
- VAWA Offenses—Any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense but is included in the Criminal Offenses category for Clery Act reporting purposes); and
- Arrests and Referrals for Disciplinary Action for Weapons—Carrying, Possessing, Etc. Law Violations, Drug Abuse Violations and Liquor Law Violations.

The College must include in our federal and state crime statistics reporting the number of all reported offenses classified and counted from the records of calls for service.

The crime statistics listed in this report and submitted to the Department of Education in October 2024 reflect crimes reported in calendar year 2023 and pertain to the College main campus location: 1608 Walnut Street, Suite 1900, Philadelphia, PA 19103. Per federal reporting procedures the data reported in this report is for the previous calendar year. Policies and procedures are current and pertain to our Walnut Street location.

Reporting Crimes

The College strongly encourages the accurate and prompt reporting of all crimes to a Campus Security Authority (CSA). Peirce students, faculty members, staff, or visitors who observe a security incident or problem are encouraged to notify a CSA, but may also report criminal offenses to the Philadelphia Police

Department.

CSAs are not responsible for determining authoritatively whether a crime took place—that is the function of law enforcement personnel. CSAs should not try to apprehend the alleged perpetrator of the crime. At Peirce College, CSAs are supervised by the Vice President, Finance and Administration, who directs reporting of a crime or suspected crime to local police and cooperates with investigations.

Campus Security Authority (CSA)

Under the *Clery Act*, a crime is "reported" when it is brought to the attention of a campus security authority or local law enforcement personnel by a victim, witness, other third party or even the offender. Institutional statistics are based on reports of alleged crime incidents. It is not necessary for a crime to have been investigated by police or the campus security authority.

The Clery Act requires institutions to identify a Campus Security Authority (CSA) whose main function is to collect crime report information. CSAs are responsible for reporting allegations of crimes that are reported to them in their capacity as a CSA. They are **not** responsible for investigating or reporting incidents they may learn about in an indirect manner, i.e., overheard in the hallway, group discussion, etc.

At Peirce College, the Vice President, Finance and Administration, oversees security services and the College's Campus Security Authorities (CSAs). Peirce has designated the following CSAs:

Vice President, Finance and Administration	215-670-9218
Vice President, Academic Affairs & Provost	215-670-9265
Vice President, Enrollment Management & Student Services	215-670-9210
Associate Dean, Student Support Services	215-670-9423
Senior Director, Marketing & External Relations	215-670-9476
Chief Information Officer	215-670-9235
Associate Vice President, Human Resources & Chief Diversity/Inclusion Officer	215-670-9328

CSAs serve as a point of contact for students and employees regarding emergencies, crimes, and safety and security concerns. They alert the Vice President, Finance and Administration, when aware of known or suspected crime on campus, on public property, or on non-campus property per the requirements of the Clery Act. The Vice President, Finance and Administration, directs reporting of a crime or suspected crime to local police and cooperates with any investigations.

Peirce College does not maintain a campus police or security department and does not keep a daily crime log of alleged criminal incidents that is open to public inspection. Any incident requiring arrest on campus will be transferred to the jurisdiction of the Philadelphia Police Department.

Confidential Reporting

Peirce College encourages anyone who is the victim or witness to any crime to promptly report the incident to the local police by dialing 911. Because police reports are public records under state law, Peirce College cannot hold reports of crime in confidence, as required by federal, state, and local laws. Confidential reports for the purposes of inclusion in the annual disclosure of crime statistics can generally be made to the Associate Dean, Student Support Services; Vice President, Enrollment Management and Student Services or the Vice President, Academic Affairs and Provost.

Any individual may make an anonymous report concerning an act of sexual discrimination or Sexual Harassment (including Sexual Violence). An individual may report the incident without disclosing their name, identifying the Respondent, or requesting any action. Depending on the extent of information available, the College's ability to respond to an anonymous report may be limited. The College provides a 24/7/365 hotline at www.peirce.ethicspoint.com or (855) 857-5885.

The College prohibits retaliation against a student or employee who, in good faith, registers a complaint or brings such information to the College's attention. Violations of the law will be referred to law enforcement agencies and, when appropriate, to the Associate Dean, Student Support Services, or the Associate Vice President, Human Resources & Chief Diversity/Inclusion Officer, for review. In the event that a situation arises, either on or off campus, that, in the judgment of the College, constitutes an ongoing or continuous threat, a [campus wide] "timely warning" will be issued to students, faculty, and staff. This warning will be issued through the College email system, student portal, www.peirce.edu website, and/or other means deemed appropriate by the College.

Off Campus

Peirce College does not monitor criminal activity occurring off campus. Any criminal activity occurring off campus in the vicinity of our new main campus located at 1608 Walnut Street is under the jurisdiction of local police departments and should be reported by dialing 911.

Peirce College does not maintain and/or support any officially recognized student organizations with off campus locations. Peirce College does not maintain any on-campus or off- campus student housing facilities.

Crime Prevention & Security Awareness Programs

Campus safety and security at Peirce College is a shared responsibility. The best protection against crime is an aware and informed campus community of students, faculty, staff, and visitors who exercise good judgment and caution.

The vast majority of our students, faculty, staff, and visitors do not experience crime at the College. Despite everyone's preventive efforts, unfortunately, crime sometimes occurs. As part of our commitment to campus safety and security, and in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Pennsylvania Uniform Crime Reporting Act, we provide crime prevention information during College orientations and throughout the year.

The following is an overview of programs and community awareness activities that the College provides on an ongoing basis:

Campus Safety Training/Professional Development

This training is to review procedures and best practices in response to a campus emergency. The training focuses on ways to best respond when there is a threat to the safety of members of the Peirce Community. Sexual Harassment & Assault Prevention/ Clery Act/Title IX training sessions are facilitated by the College's legal counsel for faculty, administration, and staff.

Timeframe: Every two years

The College ensures that its Title IX personnel have adequate training: the Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the College's Education Program or Activity, how to conduct an investigation, the College's Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by

avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Members of the Decision Panel are trained on the definition of Sexual Harassment, the Live Hearing process, the technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process. Materials used to train Title IX personnel are posted on the College's website: https://www.peirce.edu/content/pdf/compliance/DMi-Webinar-TitleIX.pdf

Testing of Emergency Response Procedures

At least semi-annually, Peirce College will conduct testing of emergency response procedures to practice and improve our protocols.

Safety/Awareness Messages to the Peirce College Community

Informing the College community about safe practices on an ongoing basis is helpful in educating individuals on ways to protect themselves. The College sends email messages at least three times a year to inform and remind the community (including faculty, staff, students, and administrators) about preventive and/or proactive measures they can take.

Timeframe: Periodic

New Student Orientation Programming

The College's orientation course provides students with information on sexual assault awareness and prevention, bystander education, survivor support, online dating safety, the College's Drug & Alcohol Policy and related resources.

Timeframe: Ongoing

Criminal Records

Peirce College conducts a criminal background check on all new hires during the application process. There is no policy for inquiring if students have a criminal record during the admission process. Students enrolled in the Health Information Technology program are required to submit to a criminal background check and other clearances prior to participating in the Professional Practice Experience (PPE).

Alcohol and Illegal Drugs

Peirce College maintains a strong commitment to programs that promote the health, well-being, and safety of its students and employees and the security of its premises. Consistent with this commitment, the College has established policies governing the unlawful use, consumption, possession, selling, distribution, dispensing, and manufacture of alcoholic beverages and illegal drugs. Please see the *Alcohol and Illegal Drugs Policy* in the *College Catalog* and the *Substance Abuse Policy* in the College Policies for employees located at College Policies for employees located at: my.peirce.edu

Peirce College complies with all federal, state, and local laws, which regulate the sale, possession, and use of **alcohol and illegal drugs** while on the premises of the College and while off campus participating in any College-sponsored activity or event. The College neither condones nor shields from prosecution any individual found in violation of the Pennsylvania liquor control laws.

With regard to alcoholic beverages and illegal drugs, Peirce College students are prohibited from the following:

 Using, consuming, possessing, selling, distributing, dispensing, or manufacturing alcoholic beverages while on the premises of the College and while off campus participating in any College-sponsored activity or event.

- Storing any alcoholic beverages on College premises.
- Being under the influence of alcoholic beverages while on the premises of the College or while off campus participating in any College-sponsored activity or event.

According to Pennsylvania state law, those under the age of 21 are prohibited to possess, consume, purchase, and furnish alcohol.

Members of the College community (including former students or graduates) while on College premises or while off campus participating in any College-sponsored activity or event are expected to conduct themselves in compliance with College policies, as well as conduct themselves in a manner in which they do not cause harm to themselves or others, and that they neither break laws nor contribute to the negligence of others. The College reserves the right to revoke College privileges in such circumstances.

Members of the College community violating alcohol/substance policies or laws may be subject to sanctions by the College, disciplinary action, criminal prosecution, fines, and imprisonment.

Substance Abuse Education, Counseling, and Information

Peirce College is committed to providing educational programs and counseling to students (including alumni) and employees concerning the risks associated with alcohol and illegal drug use and/or abuse.

Walker Center for Academic Excellence (215-670-9251) and the Human Resources Department (215-670-9217) provide drug and alcohol prevention information and programming. The Peirce College Catalogs and the College Policies for employees located at:

https://my.peirce.edu/ics/Intranet/College Policies (login required), contain the College's substance abuse policies, information about drug and alcohol awareness, health risks, and resources on where to receive help and counseling, as well as College disciplinary actions. Please see the College's Community Calendar on the main page of the College portal, my.peirce.edu, for specific workshops and programs related to substance abuse.

The Pennsylvania Department of Health refers people to the Network of Drug and Alcohol Single County Authorities (SCA), which is responsible for coordinating all county alcohol and other drug prevention, intervention, and treatment efforts. **The Philadelphia SCA** provides the following contact information for people seeking treatment for Drug & Alcohol abuse:

- People on medical assistance from the state of PA, call 1-888-545-2600
- People without medical assistance, call 215-546-1200
- People with private insurance should contact their insurer for information.

Alcohol, Drug Use, and Legal Sanctions

The following is a summary of significant legal sanctions under Pennsylvania law for the unlawful possession or distribution of illegal drugs and alcohol. In addition, any student who is convicted under state or federal law involving the possession or sale of a controlled substance will be ineligible for federal student financial aid for specific periods of time, depending on the nature and number of the offense(s).

The Pennsylvania Vehicle Code as well as the Pennsylvania Crimes Code provide penalties pertaining to the **possession and distribution of alcohol**. Prohibitions include, among other things:

The Pennsylvania Vehicle Code, 75 Pa. C.S.A. § 3101 et seg.:

Pennsylvania has set .08% Blood Alcohol Content (BAC) as the legal limit for driving under the influence convictions. This law prohibits, among other things, a driver in any vehicle from consuming any controlled substance in the vehicle while the vehicle is in operation on any highway in Pennsylvania. Any person who causes the death of an individual while driving under the influence will be guilty of a felony and shall be ordered to serve a minimum term of imprisonment of not less than three years. Any person who negligently causes serious bodily injury to another person while driving under the influence will be guilty of a felony of the second degree.

• The Pennsylvania Crimes Code, 18 Pa. C.S.A. § 5505:

<u>Public Drunkenness</u> - A person is prohibited from appearing in public manifestly under the influence of alcohol to the degree that he may endanger himself or herself or other persons or property or annoy other persons in the vicinity. Penalties range from a fine of up to \$500 (first violation) to imprisonment for up to 90 days.

The Pennsylvania Crimes Code, 18 Pa. C.S.A. § 6307 et seq.:

Misrepresentation of Age - Individuals are prohibited from misrepresenting one's age knowingly and falsely, in order to obtain liquor or malt or brewed beverages. Penalties range from a fine of up to \$500, imprisonment for up to one year and include suspension of license from 90 days to two years. It is also a crime to knowingly, willfully, and falsely to represent that another is of legal age to obtain liquor or malt or brewed beverages. Penalty is a minimum fine of \$300 and imprisonment for up to one year.

<u>Purchase, Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverages by a Minor</u> - Minors are prohibited from an attempt to purchase, consume, possess, or knowingly transport such beverages. Penalties range from fines of up to \$500, imprisonment of up to 90 days and license suspension of 90 days for first offenses; penalties for three or more offenses are up to \$1,000 in fines, imprisonment of up to 90 days, and license suspension for up to two years.

<u>Prohibited Sale to Minors</u> - It is a crime to intentionally and knowingly sell, furnish or purchase with intent to sell or furnish, any liquor, malt, or brewed beverages to minors. Penalty for a first violation is a minimum of \$1,000; \$2,500 for each subsequent violation; imprisonment for up to one year for any violation.

<u>False Identification Cards</u> - It is a crime intentionally, knowingly, or recklessly to manufacture, make, alter, sell, or attempt to sell an identification card falsely representing the identity, birth date, or age of another. Minimum fine is \$1,000 for the first violation; minimum of \$2,500 for subsequent violations; imprisonment for up to two years for any violation. It is also a crime to possess a false identification card or for a minor to obtain or attempt to obtain liquor or malt or brewed beverages by using a false identification card. Penalties range from a fine of up to \$500, imprisonment for up to one year and include suspension of license from 90 days to two years.

 Supplemental information may also be found at the website for the Pennsylvania Liquor Control Board, <u>www.lcb.state.pa.us</u>.

Laws pertaining to the distribution and possession of illegal drugs include:

• The Controlled Substance, Drug, Device and Cosmetic Act, 35 Pa. Cons. Stat. § 780-101 et seq., prohibits, among other things, the manufacture, sale, distribution, or possession of any controlled substance. Penalties under the Act range in severity depending on the act committed

and the controlled substance involved. First-time violators may be sentenced to imprisonment for up to one year, ordered to pay a fine up to \$5,000, or both. Repeat offenders may be sentenced to imprisonment for up to three years, ordered to pay a fine up to \$25,000, or both.

- The Pharmacy Act, 63 Pa. Cons. Stat. § 390-8, prohibits any person from, among other things, procuring or attempting to procure any drug through fraud, deceit, misrepresentation, subterfuge, by forgery or alteration of a material fact, or by the use of a false statement in any prescription. Any person who violates the Act may be sentenced to imprisonment for up to one year, ordered to pay a fine up to \$5,000, or both. For each subsequent offense, an individual may be sentenced to imprisonment for up to three years, ordered to pay a fine up to \$15,000, or both.
- The Federal Controlled Substances Act, 21 U.S.C. § 801 et seq., prohibits, among other things, the manufacture, distribution, dispensing, or possession, with intent to manufacture, distribute, or dispense, of a controlled substance. Penalties under the Act range in severity depending on the type and quantity of the controlled substance involved. The maximum penalties are life imprisonment, a fine of \$4,000,000, or both. Penalties are increased for repeat offenders. Double penalties apply when the violation of the law takes place within one thousand feet of the property of a school or college. The penalty for simple possession is a sentence of a term of imprisonment for up to one year, a minimum fine of \$1,000, or both.
- For more information about drug abuse and prevention, please visit www.drugabuse.gov.
- Additional Resources
 - o Department of Justice Office of Violence Against Women www.usdoj.gov/ovw
 - o Pennsylvania Liquor Control Board www.lcb.state.pa.us
 - o The Pennsylvania State Police Megan's Law website www.pameganslaw.state.pa.us
 - The U.S. Department of Health & Human Services Center for Substance Abuse Prevention (CSAP) http://www.samhsa.gov/prevention/

Sexual Violence Policy (Title IX)

This policy is only applicable to alleged incidents of sex discrimination (including sex-based harassment and retaliation) that occur on or after August 1, 2024. For alleged incidents of sex discrimination or sexual harassment occurring prior to August 1, 2024, please see the College's Title IX Policy located on the intranet and College Website. Title IX Policy (2020 Final Rule): Applies to incidents before August 1, 2024. Title IX Policy (2024 Final Rule): Applies to incidents on or after August 1, 2024.

This Policy applies to the College's education program and activities, circumstances where the College has disciplinary authority, and to misconduct occurring within any building owned or controlled by a College-recognized student organization. This Policy may also apply to the effects of off-campus misconduct that limit or deny a person's access to the College's education program or activities.

The College reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws or regulations change or court decisions alter the requirements in a way that impacts this policy, this policy will be construed to comply with the most recent government laws, regulations, or court holdings.

Statement of Non-Discrimination

PEIRCE COLLEGE (the "College") is committed to providing a work and educational environment free of unlawful discrimination, harassment and retaliation. The College does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity that it operates, as required by Title

IX and its regulations, including in admission and employment. Discrimination on the basis of sex includes discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex-based harassment is a form of sex discrimination. Inquiries about Title IX may be referred to the College's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both.

Title IX Coordinator

Title IX compliance requires the College to respond promptly and effectively when the College has knowledge of conduct that reasonably may constitute sex discrimination. The Title IX Coordinator coordinates College's efforts to comply with its Title IX responsibilities.

TITLE IX COORDINATOR	Carrie Robinson AVP, Human Resources and Chief Diversity & Inclusion Officer	1608 Walnut Street, Suite 1900 Philadelphia, PA 19103	cnrobinson@peirce.edu	(215) 670-9328
TITLE IX DEPUTY COORDINATOR	Tracey Thomas Assistant Dean, Student Support Services	1608 Walnut Street, Suite 1900 Philadelphia, PA 19103	tathomas@peirce.edu	(215) 670-9423
TITLE IX DEPUTY COORDINATOR	Sherice Sargent, Director, Human Resources	1608 Walnut Street, Suite 1900 Philadelphia, PA 19103	ssargent@peirce.edu	(215) 670-9217
TITLE IX DEPUTY COORDINATOR	Giselle Marte, Associate Director, Faculty Recruitment & Development	1608 Walnut Street, Suite 1900 Philadelphia, PA 19103	gamarte1@peirce.edu	(215) 670-9256

Any person can report sex discrimination in person, by mail, telephone, or e-mail, using the contact information listed above for the Title IX Coordinator. A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed in response.

The College's complete Title IX Policy, August 1, 2024, including Key Definitions; Procedures for Reporting; Grievance Procedures; Disciplinary Sanctions and Remedies, Recordkeeping, Appeals, etc., can be located at Consumer Information at www.peirce.edu.

Sex Offender Registration

In accordance with the Jeanne Clery Act and the Family Rights and Privacy Act of 1974, the College is required to issue information advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already obligated to register in a State to provide notice to each institution of higher education in that State at which the person is employed, carries a vocation, or is a student. Students and employees of Peirce College seeking law enforcement agency information concerning registered sex offenders can visit www.pameganslaw.state.pa.us, an online listing established by the Pennsylvania State Police to provide timely information to the public on Sexually Violent Predators residing in the Commonwealth. Students

and employees may also refer to sex offender registries for Delaware and New Jersey:

- Delaware: https://www.registeredoffenderslist.org/delaware-sex-offenders.html
- New Jersey: https://www.njsp.org/sex-offender-registry/index.shtml

Unlawful use of the information for purposes of intimidating or harassing another is prohibited. If you suspect that a child is being abused or neglected, please contact your local child protective services office or local law enforcement agency. Many States have a toll-free number to report suspected child abuse or neglect. To find out where to call, visit https://www.childwelfare.gov/topics/responding/reporting/how/

Peirce College Annual Crime Reporting and Disclosure

- The statistics in this report are published in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Pennsylvania Uniform Crime Reporting Act and Chapter 33 of Pennsylvania Code.
- The report is prepared by Institutional Research under direction of the Vice President, Finance and Administration and the Vice President, Academic Affairs and Provost.
- The crime statistics listed in the report include the categories of criminal homicide, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Peirce College requests crime statistics from the Philadelphia Police Department's Office of Public Affairs for the crimes reported on and around its campus.
- The College regularly reports criminal incidents to State police agencies and reports to local police agencies whenever there is an incident that requires legal authorities.
- Students and employees of the College are notified annually about the availability of the security report, published by October 1 each year. The report is available on the web at https://www.peirce.edu/about-peirce/additional-resources/consumer-information and the student portal at my.peirce.edu (Security tab). Current and prospective students and employees are entitled to receive a print copy of this report upon submitting a request to the Associate Dean, Student Support Services at 215-670-9251.
- In 2022, the College's urban campus consisted of two buildings located along Pine, Waverly, and South Carlisle Streets in Philadelphia, Pennsylvania, with an address of 1420 Pine Street, Philadelphia, PA 19102. In spring 2023, Peirce College relocated its main campus to 1608 Walnut Street, Suite 1900, Philadelphia, PA 19103. The College occupies the entire 19th floor of this urban high-rise.
- Per the Clery Act definition, there is no non-campus or residential property associated with Peirce College and, therefore, no non-campus or residential crime to be reported. Peirce does not operate any residential facilities, and does not prepare an annual housing facilities fire report or a missing student report.
- The following Public Property offenses reflect the statistics provided by the Philadelphia Police Department, 9th District, Sector 1.

To request a print copy of this document, please contact the Associate Dean, Student Support Services at 215-670-9251.

PEIRCE COLLEGE CRIME STATISTICS: FOR FEDERAL REPORTING PURPOSES - 2021-2023

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act

The Clery Act requires the release of statistics for certain criminal incidents, arrests, and disciplinary referrals on campus to all students and employees, and, upon request, to prospective students and employees. The law requires that these statistics be shown in specific geographic categories. Statistics are provided in compliance with the specific time periods, crime classifications, geographic categories, and arrest data mandated by federal law. Please note that these statistics use federal crime classifications, which vary from the crime classifications under state law, which are also published in this report. The statistics reported below reflect the number of incidents reported to the College's Security Services. They do not indicate actual criminal prosecution or student judicial action, or the outcome of either.

		On-Campus 1420 Pine St for 2021/2022 and 1608 Walnut St. for 2023			Public Property 1420 Pine St for 2021/2022 and 1608 Walnut St. for 2023		
	21	22	23	21	22	23	
Criminal Offenses							
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	
Manslaughter by Negligence	0	0	0	0	0	0	
Rape	0	0	0	0	0	0	
Fondling	0	0	0	0	0	0	
Incest	0	0	0	0	0	0	
Statutory rape	0	0	0	0	0	0	
Robbery	0	0	0	4	5	1	
Aggravated Assault	0	0	0	0	2	0	
Burglary	0	0	0	0	0	0	
Motor Vehicle Theft	0	0	0	0	0	1	
Arson	0	0	0	0	0	0	
Hate Crimes							
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	
Rape	0	0	0	0	0	0	
Fondling	0	0	0	0	0	0	
Incest	0	0	0	0	0	0	
Statutory rape	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	
Aggravated Assault	0	0	0	0	0	0	
Burglary	0	0	0	0	0	0	
Motor Vehicle Theft	0	0	0	0	0	0	
Arson	0	0	0	0	0	0	
Simple Assault	0	0	0	0	0	0	
Larceny/Theft	0	0	0	0	0	0	
Intimidation	0	0	0	0	0	0	
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	
VAWA Offenses							
Domestic Violence	0	0	0	0	0	0	
Dating Violence	0	0	0	0	0	0	
Stalking	0	0	0	0	0	0	
Arrests and Referrals for Disciplinary Action							
Weapons Possession – Arrests	0	0	0	0	0	0	
Drug Abuse Violations – Arrests	0	0	0	0	0	0	
Liquor Law Violations – Arrests	0	0	0	0	0	0	
Weapons Possession – Referrals	0	0	0	0	0	0	
Drug Abuse Violations – Referrals	0	0	0	0	0	0	
Weapons Possession – Arrests	0	0	0	0	0	0	
Drug Abuse Violations – Referrals	0	0	0	0	0	0	
Liquor Law Violations – Referrals	0	0	0	0	0	0	

PEIRCE COLLEGE CRIME STATISTICS FOR PENNSYLVANIA REPORTING PURPOSES – 2021 - 2023

The Pennsylvania Uniform Crime Reporting Act

The Pennsylvania Uniform Crime Reporting Act mandates the release of crime statistics and rates to matriculated students and employees, and, upon request, to new employees and applicants for admission. The index rate is calculated by multiplying the actual number of reported offenses by 100,000 (a theoretical population for comparison purposes) and dividing that product by the number of the College's Full Time Equivalent (FTE) students and employees. The FTE is calculated using a state required formula. The College's FTE Population was 869 in 2020/21; 729 for 2021/22; and 665 for 2022/23. The statistics reported below reflect the number of incidents reported to the College's Security Services. They do not indicate actual criminal prosecution or student judicial action, or the outcome of either. Please note that the state crime classifications for which the College is reporting these statistics varies from the crime classifications under federal law, which are also published in this document.

	2021		2	2022	2023	
Part I Offenses	ACTUAL	INDEX	ACTUAL	INDEX	ACTUAL	INDEX
Murder and Non-negligent Manslaughter	0	0.00	0	0.00	0	0.00
Manslaughter by Negligence	0	0.00	0	0.00	0	0.00
Rape	0	0.00	0	0.00	0	0.00
Attempts to Commit Forcible Rape	0	0.00	0	0.00	0	0.00
Robbery	0	0.00	0	0.00	0	0.00
Aggravated Assault	0	0.00	0	0.00	0	0.00
Burglary	0	0.00	0	0.00	0	0.00
Larceny-Theft	0	0.00	0	0.00	0	0.00
Vehicle Theft	0	0.00	0	0.00	0	0.00
Arson	0	0.00	0	0.00	0	0.00
TOTAL	0	0.00	0	0.00	0	0.00
	2020		2021		2022	
Part II Offenses	ACTUAL	INDEX	ACTUAL	INDEX	ACTUAL	INDEX
Other Assaults	0	0.00	0	0.00	0	0.00
Forgery and Counterfeiting	0	0.00	0	0.00	0	0.00
Fraud	0	0.00	0	0.00	0	0.00
Embezzlement	0	0.00	0	0.00	0	0.00
Stolen Property	0	0.00	0	0.00	0	0.00
Vandalism	0	0.00	0	0.00	0	0.00
Weapons	0	0.00	0	0.00	0	0.00
Prostitution	0	0.00	0	0.00	0	0.00
Sex Offenses	0	0.00	0	0.00	0	0.00
Drug Abuse Violations	0	0.00	0	0.00	0	0.00
Gambling	0	0.00	0	0.00	0	0.00
Offenses Against the Family and Children	0	0.00	0	0.00	0	0.00
Driving Under the Influence	0	0.00	0	0.00	0	0.00
Liquor Law	0	0.00	0	0.00	0	0.00
Drunkenness	0	0.00	0	0.00	0	0.00
Disorderly Conduct	0	0.00	0	0.00	0	0.00
Vagrancy	0	0.00	0	0.00	0	0.00
All Others	0	0.00	0	0.00	0	0.00
Suspicion	0	0.00	0	0.00	0	0.00
TOTAL	0	0.00	0	0.00	0	0.00

APPENDIX A

Responsibilities of Emergency Wardens

Primary Emergency Warden responsibilities:

- Understand the layout of the office, including exits, location of pull stations and fire extinguishers
- Identify individuals that need assistance in evacuating the building and assign an Emergency Aid to assist in the evacuation.
- Determine if the emergency action is to shelter in place or evacuate
- In the event of shelter in place, instruct individuals to take cover and stay still
- In the event of evacuation, coordinate and direct the evacuation of all individuals
- Ensure a secondary warden is positioned at the stairwells.
- During the evacuation, walk throughout the office to ensure that all individuals are aware of the evacuation and are proceeding to the stairwell

Secondary Emergency Warden responsibilities:

- In the event of shelter in place, instruct individuals to take cover and stay still
- In the event of an evacuation, position yourself at the stairwell
- Remind individuals to enter the stairwell in a single file and remain quiet so that all announcements can be heard
- Monitor the evacuation of individuals that need assistance
- Report the evacuation process to the Primary Emergency Warden

Aide responsibilities:

- Locate the assigned individual and assist them to the stairwell
- Once at the stairwell, report to the Secondary Warden that you are proceeding down the stairwell
- If a problem is encountered moving the assisted individual down the stairwell, the Aide should proceed to the nearest stairwell phone and request assistance from building management

Appendix B

Emergency Protocols for Different Types of Emergencies

Fire Emergencies

Our office is equipped with sprinklers, smoke detectors, fire alarms, and fire extinguishers. In the event of a fire in our office or anywhere else in the building, the fire alarms will activate.

Should it be necessary to evacuate the building due to a fire:

- Remain calm
- DO NOT USE ELEVATORS
- Do not evacuate until instructed to do so. Unnecessary evacuation could result in overcrowding in the stairwells, confusion and injury
- Follow the instructions of the Primary and Secondary Emergency Wardens
- Notify others in your vicinity of the need to evacuate
- Exit calmly through nearest stairwell; keep to the right side, close to the wall
- Move at least one block away from the building

Important Points to Remember:

- As smoke and heat rise, keep low to the ground or crawl when traveling through smoke. The lower air will be cooler and easier to breathe.
- If caught in smoke, take short breaths. Breathe through your nose.
- Do not break windows to vent smoke. Instead, fresh air will rush in and fuel the fire.
- Do not open hot doors. Before opening any door, touch it near the bottom, moving upward to
 feel if it is hot. A fire on the other side will blast through the slightest opening with tremendous
 force and the fumes are dangerous.
- Do not return for personal items if ordered to evacuate.

Should You Discover a Fire:

- Isolate the fire
- Evacuate the room
- Remove anyone in immediate danger and close doors; this will slow down the spread of fire
- Call the Fire Department (911); do not assume someone else has called
- Alert others and activate the fire alarm
- Notify the building property manager

Medical Emergencies

In the event of a medical emergency, administer first aid if you have the appropriate training.

- Remain calm.
- Call 911 for ambulance or rescue units and provide critical information.
- Call the building property manager at 215-732-1544. Building management will prepare the elevator to meet emergency services.
- Clear area and keep the victim comfortable until assistance arrives.

Active Shooter Response

In the event of an active shooter, quickly determine the most reasonable way to protect your life given the circumstances. Law enforcement recommends **RUN**, **HIDE**, **FIGHT**.

If possible, call 911. If you are unable to speak, leave the phone line open so the Dispatcher can listen.

Run Have an escape route. Evacuate even if others don't agree to follow. Leave belongings behind. Help others escape if possible. Follow the instructions of any police. Keep your hands visible if law enforcement are on-site. Do not attempt to move wounded people. Once safe, notify Emergency Services by calling 911.

Hide Hide out of view. Lock or barricade the door. Close windows and curtains. Silence your cell phone and other devices. Turn off any source of noise. Hide behind large items (i.e., cabinets, desks). Remain quiet and calm. Once safe, notify Emergency Services by calling 911.

Fight Attempt to disrupt and/or incapacitate the shooter by acting aggressively, throwing items, using improvised weapons, and yelling, or play dead by lying motionless on the ground. Commit to whatever actions are necessary for you to survive.

When Law Enforcement Arrives:

Law Enforcement's purpose is to stop the active shooter as soon as possible. Officers may wear regular patrol uniforms or external bulletproof vests, helmets and other tactical equipment. Officers may be armed with rifles, shotguns, handguns and may use pepper spray or tear gas to control the situation. Officers may shout commands and may push individuals to the ground for their safety.

What you should do when Law Enforcement arrives:

- Remain calm, and follow officers' instructions
- Put down any items in your hands (i.e., bags, jackets)
- Immediately raise hands and spread fingers. Keep hands visible at all times
- Avoid making quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming and/or yelling
- Do not stop to ask officers for help or direction when evacuating
- Proceed in the direction from which officers are entering the premises
- Once on the street, move away from the building as quickly as possible

Peirce College Campus Safety Procedures