

Florida College of Integrative Medicine

Annual Security Report

Amended and Restated as of September 30th, 2023

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Purpose

Florida College of Integrative Medicine prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. A hard copy of the report is made available by request and is located in the Admissions office. This report is prepared in cooperation with the local law enforcement agency surrounding our campus. Campus crime, arrest and referral statistics include those reported to the Orange County Sheriff's Office and designated school officials.

All personnel must be alert for possible criminal activity occurring on campus. Everyone should remain vigilant when moving about the campus, especially in the evenings and on weekends. If needed, please contact the front office to request escort by our security to your destination.

Unusual or suspicious persons should be reported to the senior administrator, dean, or evening coordinator. In the event that staff members witness a crime or emergency occurring, they are to call 911 immediately and are then to immediately follow up by notifying a member of the administrative staff of the incident. In the event that a student witnesses a crime or emergency occurring, they are to call 911 immediately and are then to immediately follow up by notifying the nearest staff member who will then notify administration if necessary.

Student Conduct

Classroom Conduct

The College expects students to contribute to a positive learning environment and to promote a professional standard of study and academic scholarship. Students are expected to respect the rights of the classroom instructors and those of other students and to treat one another as medical professionals and colleagues.

Campus Conduct

Only students, faculty, staff, and authorized patients and visitors are permitted on campus. All visitors must be authorized, display a visitor badge from the reception desk and must always be accompanied by the student host. Guests are not allowed to be in the classroom unless authorized by administration, or clinic (except as a patient) but may be on the grounds or student lounge while accompanied by their host. This includes children. Students may not bring children to class or to the clinic (except as patients) or leave children anywhere on campus.

Pets are not permitted on campus, except for trained animals assisting a student with a disability.

For anything not covered in this section or in the sections below, students should seek guidance from their instructors, the Administration, and the Dean, in particular. However, students should always follow the general principle of maintaining a professional and academic environment appropriate to a medical school.

General Standards of Conduct

All students enrolling in the College assume an obligation to conduct themselves at all times as responsible members of the College's campus community and in accordance with standards of common decency and decorum. As candidates for becoming primary health care physicians, students are expected to be cooperative and helpful and to show compassion and consideration for patients and for each other. Students who fail to develop and show appropriate regard for patients and for other students and staff will probably not become successful Acupuncture Physicians.

Recognition and respect for the personal and property rights of others and with the educational mission of the College are also required. In addition, the violation of local, state, or federal law as well as College regulations may result in disciplinary action.

Misconduct Defined

These general standards are applicable to behavior of students and organizations on and off the College's campus if that behavior is determined to be incompatible with the educational environment and mission of the College. The right to proceed with College disciplinary proceedings shall in no way be affected by the filing of criminal or civil charges in any court by a person or any government entity against the accused student or organization. A student or organization may be disciplined up to and including suspension and expulsion if deemed to be in violation of the general standards of conduct or for the commission of or the attempt to commit any of the following offenses:

- Actual or threatened physical abuse, threat of violence, intimidation, hazing, sexual harassment, or any other act which endangers the health, safety or sense of wellbeing of any person.
- Destruction, damage, or misuse of the College's property.
- Theft, attempted theft, burglary, attempted burglary, accessory to these acts, and/or possession of stolen property.
- Unauthorized manufacture, sale, delivery, use of, or possession of any drug or drug paraphernalia defined as illegal under local, state or federal laws.
- The unlawful possession, use or distribution of illicit drugs or alcoholic beverages on College property or in connection with any College activity.
- Use, possession, or distribution of firearms, knives, fireworks, weapons, any incendiary device, or explosive device or material on the College's property or campus areas.
- Disorderly conduct on the College's property or campus areas.
- Lewd, indecent, or obscene behavior or expression.
- Trespassing or unauthorized entry to or use of College property or campus areas.
- Unauthorized use or attempted use of any services belonging to or provided by the College, including but not limited to computer, telephone, cable television, copying facilities, or any such service.
- Unauthorized possession of a key to any College facility.
- Unauthorized use or "borrowing" of College equipment for on-campus or off-campus activities.

- Interference with the use of or access to College facilities, obstruction or disruption of teaching, research, administration, service, disciplinary procedures or other activities on College property by either College or non-College persons or groups.
- Failure to promptly comply with directions of College officials or law enforcement, fire or other rescue officers who are acting in the performance of their duties.
- Entering false fire alarms or bomb threats, tampering with fire extinguishers, alarms or other safety or firefighting equipment.
- Conviction for any misdemeanor or felony that adversely affects the educational environment of the College.
- Deliberately misinforming the College or withholding information that affects a student's financial aid, legal residency, legal status, or academic status.
- Unethical conduct or dishonest representation related to the College or to campus activities, including activities related to student organizations and Student Government and unauthorized representation and misrepresentation of the College.
- Violation of any College policies or regulations as published in the FCIM Student Handbook and FCIM Annual Security Report, including but limited to those governing the time, place, and manner of public expression; the registration of student organizations; the use of facilities; and the use and parking of motor vehicles at the College.
- Attempts to undermine or bypass College policies and procedures.
- Conduct in violation of public law, federal and state statutes, local ordinances, or College regulations or policies whether or not specified in detail, which adversely affects the student's suitability as a member of the academic community and regardless of whether such conduct has resulted in a conviction under a statute or ordinance.
- A pattern of ongoing or episodic disruptive behavior that impairs the overall functioning of the College, the Clinic, its students, its staff, or related outside activities.
- Any other activity or conduct not specifically stated herein, which impairs or endangers any person, property, or the educational environment of the College.

Disciplinary Procedures

College disciplinary procedures are designed to protect each student's right to procedural and substantive due process and safeguard personal and confidential information concerning the student. These procedures may differ from those of a courtroom or other judicial proceedings. Disciplinary actions are based on all attendant circumstances. Official notifications are issued to affected parties. The College maintains official records of all disciplinary actions and communications. Possible sanctions include disciplinary warning, reprimand, probation (with or without conditions), suspension, and expulsion.

Penalties for general misconduct are as follows:

- Suspension from the Program for a period of time determined by the Dean of Academic Affairs while the College is conducting an investigation of the student's conduct that is of concern to the College.
- Expulsion from the College.

Accessibility of Facilities

The College's facilities are accessible to mobility handicapped students and patients and complies with all federal, state and local building and healthcare facility regulations and with the Americans with Disabilities Act.

Campus Security and Safety

Pursuant to the Campus Security Act (Public Law 101-542), the College maintains data on campus crime. This information is available in Appendix B of this FCIM Annual Security Report.

Students must always follow safety rules and guidelines in the Clinic and act prudently and safely in all College facilities and on campus grounds. Students are expected to be particularly cautious in the parking lots and on campus grounds and in the area of the lake—and especially with regard to wildlife and unfamiliar strangers. Posted signs and advisements need to be followed. Students must obtain permission from the Administration before initiating or participating in any activity that is not reasonably related to their academic studies at the College while on College grounds. The College cannot be held responsible for students whose behavior is imprudent, unsafe, negligent, reckless or hazardous to themselves or others.

The safety of our students, employees, and guests is of paramount importance please follow the below security procedures:

ID cards must be worn at all times on the FCIM campus. Please place them on the upper right hand area of your chest.

Faculty and staff members must pre-authorize guests or visitors via a sign-in book at the front desk.

Students can sign-in a maximum of two visitors at any given time, but the student must stay with the guests throughout the duration of their visit at the College.

All individuals, other than faculty, staff or students (i.e., patients, guests, delivery personnel, contractors etc.) must sign-in at the reception desk where they will receive an ID card to be worn while on College campus. Their on-campus destinations will be contacted before access will be granted.

From time to time the College may be required to conduct internal investigations or bag searches pertaining to security.

Students, faculty, and staff are expected to cooperate fully and assist in these investigations, if requested to do so.

If an unauthorized individual is observed on campus, students, faculty, and staff members should immediately direct the individual to the reception area to sign in and receive an ID card.

To identify authorized vehicles on campus, all FCIM faculty, students, and staff are each issued one parking permit for their personal vehicle to be placed on the interior lower left corner of the vehicle's windshield (unauthorized vehicles are subject to being towed at the owners expense). Fees apply for additional parking permits.

Personal Safety Recommendations

Vehicles: Be aware of any suspicious automobiles or trucks parked near the College.

Entrances/Exits: Please pay special attention to any unusual activity by individuals around entrances and exits, particularly those that are not commonly used.

Bag searches: FCIM has the authority, at its sole discretion, to search any bag (i.e., backpacks, handbags, instrument cases) that is brought onto campus grounds. Please give the staff member conducting the search your full cooperation.

Suspicious parcels: Although it is extremely unlikely, it is possible that harmful biological or chemical substances may be delivered in the mail or by messenger. The U.S. Postal Service has compiled a list of typical characteristics of a suspicious parcel that might trigger suspicion, as well as procedures for dealing with it.

Suspicious parcels include (but are not limited to) those that:

- Are unexpected or from someone unfamiliar to you
- Are addressed to someone no longer with your organization or are otherwise outdated
- Have no return address, or have one that can't be verified as legitimate
- Are of unusual weight, given their size, or are lopsided or oddly shaped
- Are marked with restrictive endorsements, such as "Personal" or Confidential"
- Have protruding wires, strange odors, or stains
- Show a city or state in the postmark that doesn't match the return address.

If you receive a suspicious parcel in the mail

1. Do not try to open the parcel
2. Isolate the parcel
3. Evacuate the immediate area
4. Call a postal inspector to report that you've received a parcel in the mail that may contain biological or chemical substance

If you encounter suspicious vehicles, individuals, or parcels, you should immediately call 911.

Security Around the Campus

There are many police patrol cars in the area. The efforts by local law enforcement are to some extent, complemented by the work of institutional security details at various buildings. However, no matter how good the work of the area security forces, each individual must pay close attention in order to remain secure. Here are some tips:

In the classroom or clinic:

- Students are advised to not exit the main campus buildings to go to the parking lot or their cars unaccompanied after sundown or 6:30pm, whichever is earlier. Students should walk to their cars in groups of two or more individuals for maximum safety.
- Students are advised to close the doors securely behind. Our doors are designed to lock automatically when properly closed, both on the main campus and in classrooms.
- Lock your motor vehicle at all times while parked on campus and do not leave inside your vehicle any valuables that may be within eyesight of anyone walking near or by your vehicle.
- Never leave handbags, briefcases, personal electronics and personal valuables unattended.
- When taking a break, secure your valuables or take them with you.
- When the Clinic is closing or when classes are adjourned for the evening it is imperative that all students and FCIM personnel leave the premises immediately

Outside campus:

- Attempt to travel in groups of at least two during dark hours.
- Have your keys in your hand.
- Remain alert while walking and observe your surroundings.
- If your suspicions are aroused, call the police (911)
- Do not carry large sums of money, conspicuous jewelry, or other valuables.
- Do not dangle a purse at arm's length. Hold it close to your chest area. Wear shoulder bags crosswise over your chest – not just on one shoulder. Do not carry valuables in accessible parts of backpacks.
- If you hear cries for help, attempt to identify the source and call 911.
- If you believe you are being followed or you feel threatened in any manner, seek shelter in a commercial business if possible or the fire department (located at intersection of Lake Ellenor and Oak Ridge) since they are open 24 hours

If you are a crime victim:

- Report the crime to the law enforcement by calling 911.
- Attempt to remain calm while law enforcement officers respond.
- If you are injured, request medical attention.
- Remember to obtain copies of any hospital reports from the hospital and complaint numbers or case numbers from law enforcement.

- At the appropriate time, please inform an FCIM administrative staff member of the details of the crime and complete an FCIM Campus Security Reporting Form.

“In the event that a situation arises that constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. The warning will be issued through email, phone calls, or mailed notices to students, faculty and staff.”

Privacy Act of 1974

The Privacy Act of 1974 requires institutions to establish appropriate procedures for granting access to student records. Such access must be within a reasonable time, not to exceed 45 days. For students 18 years of age or older, no release is permitted of personally identifiable records, files, or other personal information contained in them without the written consent of the student, except for the following:

- Release to other officials, administrators, and instructors within the College who have legitimate educational interests.
- Release to officials of other institutions in which the student intends to enroll. (In such cases, the student is notified of the transfer, receives a copy of the records, and, if so desired, has the right to challenge the content of the record.)
- Release to authorized state and federal officials.

Students may inspect and secure copies of material from their educational files or records. A reasonable charge will accrue for copies of records.

Students may request an amendment to their records and may request a hearing with the Administration related to their records. The College is required to maintain a record of each request for access to records and for each disclosure of identifiable student information.

Since the College requires up-to-date address and contact information for each student, students must update their information on the FCIM website and notify the Registrar/Financial Aid Director as soon as possible whenever changes in addresses, phone numbers, or immigration status occur. The College is not responsible for missed deadlines or for documents, transcripts, checks, or other items that are lost due to inadequate contact information.

Harassment

The College is committed to providing a work and learning environment that is free of bullying, discrimination and harassment. This policy applies to all employees, administrators, instructors, students, and any other person who does business with the College. It is a violation of this policy for any administrator, instructor, employee, or student to engage in or condone harassment. It is the responsibility of every employee to recognize acts of sexual harassment and to take every action necessary to ensure that the applicable policies and procedures of the College are implemented.

Any person who believes he or she has been subjected to bullying, discrimination or harassment

has the right to file a complaint with the Director of Student Services and to receive prompt and appropriate handling of the complaint. In such cases, all reasonable efforts shall be made to maintain confidentiality and protect privacy. Please see Appendix C for a full description of this policy.

Timely Warnings and Immediate Notification

The College is committed to providing a work and learning environment that is free of bullying, discrimination and harassment. This policy applies to all employees, administrators, instructors, students, and any other person who does business with the College.

It is a violation of this policy for any administrator, instructor, employee, or student to engage in or condone harassment. It is the responsibility of every employee to recognize acts of sexual harassment and to take every action necessary to ensure that the applicable policies and procedures of the College are implemented.

Any person who believes he or she has been subjected to bullying, discrimination or harassment has the right to file a complaint with the Director of Student Services and to receive prompt and appropriate handling of the complaint. In such cases, all reasonable efforts shall be made to maintain confidentiality and protect privacy. Please see Appendix C for a full description of this policy.

Timely Warning

In the event of a substantiated serious security or safety concern, either on College property or in the near vicinity of the campus, numerous and diligent efforts are made to advise members of the campus community. The College takes its duty seriously to inform students and campus community members of threatening situations and how they can best protect themselves from harm. Information related to crime-related and other potentially threatening situations is provided in an accurate and timely fashion for use by students and other College community members to reduce their chances of becoming victims. These notices will be issued as a means of a “Clery Timely Warning Notice” (CTWN) or a “FCIM Alert”.

Clery Timely Warning Notices are specifically related to compliance with the federal Clery Act, which requires Colleges and universities to notify students and employees whenever there is a threat that a serious crime is ongoing or may be repeated--so that campus community members can protect themselves from harm. The Clery Act identifies specific crimes that require a timely warning notice to be issued, when crimes are reported to officials with significant responsibility for student and campus activities, campus safety, or the local police and the reported crime(s) are believed to have occurred on campus, in or on non-campus buildings or property, or on public property contiguous to the campus.

Types of incidents or situations that constitute Clery Timely Warning being sent are:

All Clery Act Crimes which represent a serious or continuing threat to the person and well-being of students and employees. Examples include but are not limited to:

- Criminal Homicide
- Robbery
- Aggravated Assault
- Burglaries (occupied rooms/offices/structures)
- Hate Crimes
- Persons with weapons with intent to use
- Threat of violent crime
- Situations where suspect is not known
- Assault (physical or sexual)
- Situations that cause major disruption to campus operations. Examples include, but are not limited to:
 - Weather-related situations
 - Power outages
 - Water emergencies

Immediate Notification

A notification issued to the College community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on a campus. An emergency notification is triggered by an event that is currently occurring on, or is imminently threatening the campus.

There is often confusion about the difference between timely warnings and immediate notification. In fact, they are often believed to be the same. Here is a table showing the differences between the two to assist.

Timely Warning	Immediate Notification
<ul style="list-style-type: none"> ● Goal is to aid in the prevention of similar crimes; ● Is to put out quickly, i.e. in a “timely manner”; ● Allows you to evaluate incidents on a case-by-case basis; ● Is only required for Clery reportable crimes. 	<ul style="list-style-type: none"> ● Goal is to alert community immediately about a significant emergency or dangerous situation involving an immediate threat to the health and safety of the College community; ● A crime doesn’t have to have occurred yet; ● Can be for the Clery reportable crimes as well as other types of incidents.

Anyone with information warranting a timely warning should report the circumstances to the FCIM Administration, or email safety@fcim.edu

Emergency Notification Personnel

Jenjen Han	Director of Campus Safety
Susan Hoeh	Director of Fire Safety
Amy Anderson	Coordinator of Safety Services
Lincoln Zhao	Title IX Coordinator

Reporting the Annual Disclosure of Crime Statistics

The Florida College of Integrative Medicine prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report can be located on our website at <https://www.fcim.edu/policies/>. You will also be able to connect to our site via FCIM Home page at <http://FCIM.edu>

Crime statistics are collected for crimes that occurred on-campus; in certain off-campus building or property owned or controlled by the Florida College of Integrative Medicine; and on public property within, or immediately adjacent to and accessible from, the campus.

Campus crime, arrest and referral statistics include those reported to the FCIM, local law enforcement agencies and designated campus officials (including but not limited to directors, deans, department heads, staff, judicial affairs, advisors to student/student organizations, athletic coaches), and local law enforcement agencies.

This statistic may also include crimes that have occurred in private residences or businesses and is not required by law.

Each year, an e-mail notification is made to all enrolled students that provide the website to access this report. Copies of the report may also be obtained at <https://www.fcim.edu/policies/>. A description of this report is located in the Student Handbook.

What Safety Tips Are Good To Know?

- Walk to your vehicle in pairs or in a group
- Vary your routine; use a different route, different times
- Be aware of your surroundings. Watch for suspicious people or activities
- When you enter your vehicle, lock all the doors and turn on your headlights. This will allow you to see anyone outside in the dark
- If you are unfamiliar with the parking lot, drive through it and check it first. If you don't feel safe, go elsewhere and wait for someone else to arrive
- Have your keys in your hand so that you don't have to search for them when you reach your vehicle
- When you know that you will be returning to your vehicle late at night, try to pick a well-lit area
- Before getting into your vehicle, visually inspect the interior for anything suspicious

- See something, say something!
- If you suspect that someone is following you, drive to the nearest open public place, or local police department.

Reporting of Criminal Offenses

Community members, students, faculty, staff, and guests are encouraged to accurately and promptly report all crimes and public safety related incidents to the FCIM Administration in a timely manner.

To report a crime, contact the FCIM Administration or dial 9-1-1 (emergencies - only), Any suspicious activity or person seen in the parking lots or loitering around vehicles, inside buildings or around the campus should be reported to the FCIM Administration.

In response to reports of crime, some cases may result in an arrest and some cases may be investigated and, if appropriate, referred to other campus officials. All incident reports involving a crime committed by a student are forwarded to the Academic Dean for review and potential administration action.

Crimes should be reported to the FCIM Administration to ensure inclusion in the annual crime statistics and to aid in providing timely warning notices to the community, when appropriate.

The FCIM Administration encourages anyone who is the victim or witness to any crime to promptly report the incident to the FCIM Administration or email to safety@fcim.edu. See Appendix A for Campus Security Reporting Form

Security and Access to Campus Facilities & Maintenance of Campus Facilities

During business hours, the College will be open to students, employees, patients, contractors, guests, invitees and members of the general public. During non-business hours access to all College facilities is by key, if issued, or by admittance via the FCIM Administration.

The College building and classrooms are video monitored 24 hours a day. The FCIM Administration receives electronic alarm notifications if doors or windows show any tampering.

Alcoholic Beverages

FCIM Administration enforces the laws of the State of Florida and local ordinances pertaining to the illegal possession, use and sale of alcoholic beverages, and underage drinking.

FCIM also condemns the inappropriate behavior resulting from alcoholic beverage abuse and may seek in result of disciplinary action. Alcohol abuse is characterized by uncontrollable behavior which infringes upon the rights of others, potential danger to self or others, or use of alcohol outside the parameters of state and/or College policy.

FCIM does not condone the following behaviors:

- Consumption, possession, or transportation of alcoholic beverages by any student who is under legal age.
- Consumption or possession of alcoholic beverages on College premises or at College sponsored activities, except when authorized at social functions in designated areas.
- Furnishing and/or distributing alcoholic beverages to any student or under legal age.
- Being in an intoxicated condition as made manifest by disorderly, obscene, or indecent conduct or appearance.
- Driving under the influence of alcohol.

Areas Open to the Public

The possession, use, sale or the furnishing of alcohol on any Florida College of Integrative Medicine property that is open to the public is prohibited, except when authorized at social functions in designated areas and pursuant to the College's Alcohol Events Policy or prior approval by the College President.

Private or Closed Areas of Campus

The possession, use, sale or the furnishing of alcohol is prohibited on any private or closed areas of Florida College of Integrative Medicine property, except when authorized at social functions in designated areas and pursuant to the College's Alcohol Events Policy or prior approval by the College President.

Education and Research Areas

The possession, use, sale or the furnishing of alcohol is prohibited in education and research areas of Florida College of Integrative Medicine property, except when authorized for education or research purposes.

Carrying of False Identification

Manufacturing, selling, distributing, possessing, or sharing any form of false identification is prohibited.

Illegal Drugs

The FCIM campus has been designated "Drug free" and only under certain circumstances is the consumption of alcohol permitted. The possession, use, sale, manufacture or distribution of any controlled substance is illegal under both the State of Florida and federal laws. Such laws are strictly enforced by the FCIM Administration. Violators are subject to College disciplinary

action, Florida state criminal prosecution, federal criminal prosecution, fines, and imprisonment.

FCIM condemns the following behaviors:

- Possession, use (without valid medical or dental prescription) manufacture, furnishing, or sale of any narcotic or dangerous drug controlled by federal or Florida law.
- Possession of drug paraphernalia.
- Being under the influence of a narcotic or other controlled substance except as permitted by law or valid medical prescription.

Sexual Assault Prevention and Response

In accordance with state and federal laws preventing sexual violence in higher education, Florida College of Integrative Medicine prohibits all forms of sexual misconduct (e.g., sexual assault, sexual violence, sexual harassment), including relationship violence (e.g. dating and domestic violence) and stalking. These offenses are illegal and will not be tolerated at FCIM. FCIM encourages students, employees and board members to prevent or respond to these types of crimes.

Other acts can also be forms of sex-based discrimination and are also prohibited whether sexually based or not and include dating violence, domestic violence, and stalking. As a result, Florida College of Integrative Medicine issues this statement of policy to inform the community of our comprehensive plan addressing sexual misconduct, educational programs, and procedures that address sexual assault, domestic violence, dating violence, and stalking, whether the incident occurs on or off campus and when it is reported to a College official. In this context, Florida College of Integrative Medicine prohibits the offenses of domestic violence, dating violence, sexual assault and stalking and reaffirms its commitment to maintain a campus environment emphasizing the dignity and worth of all members of the College.

Definitions

Consent

Words or actions that show a knowing and voluntary willingness to engage in mutually agreed-upon sexual activity. Consent cannot be gained by force, intimidation or coercion; by ignoring or acting in spite of objections of another; or by taking advantage of the incapacitation of another where the respondent knows or reasonably should have known of such incapacitation. Minors under the age of 16 cannot legally consent under Florida law.

Affirmative Consent Expresses the value all persons have the right to feel respected, acknowledged, and safe during sexual interactions. Consent to sexual activities must be freely given, must be clearly and unambiguously expressed by words or actions, and must pertain to each specific sexual activity and ongoing throughout. Verbally, this is communicated with words like, “yes,” “do that,” or “that feels good, keep going.”

Consent may be revoked at any time. Verbally, revoking consent can be communicated with “no,” “stop,” “back off,” “I don’t want to do this anymore.” A verbal “no” constitutes lack of consent. Physically, revoking consent can be communicated by pushing away, turning away, and no movement at all.

Consent is also absent when the activity in question exceeds the scope of consent previously given. Past consent does not imply present or future consent. Silence or an absence of resistance does not imply consent.

Consent can be withdrawn at any time by either party by using clear words or actions.

Examples of non-consent:	A person cannot legally consent to sexual activity if they . . .
NO means NO. “Maybe” is not consent. Silence is not consent Alcohol cannot consent. Clothes cannot consent. A date is not consent. Yesterday’s consent is not today’s consent.	. . . are under the influence of alcohol or drugs . . . are asleep . . . are unable to understand the nature of the sexual act(s) . . . are under the age of 16 (in Florida)

Sexual Harassment

Unwelcome conduct of a sexual nature, including sexual advances, requests for sexual favors or other verbal, non- verbal or physical conduct of a sexual nature. The behaviors becomes harassing when submitting to such conduct is made either explicitly or implicitly a condition of a person’s educational progress or employment. This can include unwelcome comments about a person’s physical appearance, sex-based jokes, gender-specific put- downs or other language that has the impact of being demeaning or threatening.

Sexual Exploitation

“Sexual Exploitation” occurs when an individual takes nonconsensual or abusive sexual advantage of another for his or her own advantage or benefit, or to the benefit or advantage of anyone other than the one being exploited.

Examples of sexual exploitation may include, but are not limited to, the following:

- Invasion of sexual privacy;
- Prostituting another individual;
- Non-consensual video or audio of sexual activity;
- Non-consensual distribution of video or audio of sexual activity, even if the sexual activity or video or audio taken of sexual activity was consensual;
- Intentional observation of unconsenting individuals who are partially undressed, naked, or engaged in sexual acts;
- Knowingly transmitting an STD or HIV to another individual;

- Intentionally and inappropriately exposing one's breasts, buttocks, groin, or genitals in non-consensual circumstances; and/or
- Sexually-based bullying.

Sexual Misconduct

Encompasses all forms of unwelcome, non-consensual sexual behavior, including rape, sexual assault, sexual abuse, dating violence, domestic violence, stalking or gender-based harassment or discrimination.

Sexual Assault

Any involuntary sexual act in which a person is coerced or physically forced to engage against their will, or any non-consensual sexual touching of a person. Examples include sexual fondling, penetration or touching of intimate body parts without consent.

Nonconsensual Sexual Contact

An intentional sexual touching upon a person, without consent or where the person is incapacitated, and/or by force, by another person or with any object. Sexual contact includes but is not limited to, intentional contact with the breasts, buttocks, groin, or genitals, or touching another with these body parts, or making another touch the alleged victim or themselves with or on any of these body parts.

Retaliation

Against anyone reporting, participating in, or thought to have reported or participated in an allegation or investigation regarding sexual misconduct, sexual harassment, relationship violence (dating violence, domestic violence) or stalking is also prohibited which includes but not limited to non-consensual dissemination of private sexual images, photos, videos (sometimes referred to as "revenge porn").

Rape

Rape is defined as a "male having carnal knowledge of a female forcibly and against her will. Carnal knowledge in rape occurs when there is any penetration of the female sex organs by the male sex organs."

The code recognizes that rape can occur even between spouses, so the defendant cannot use the fact that he is married to the person accusing him of rape as a defense.

Rape is punishable by death, life imprisonment with or without parole, or a minimum of 25 years imprisonment, followed by probation for life.

Relationship Violence

Includes any form of domestic or dating violence between two or more individuals that are, or were, in a relationship. Domestic violence specifically includes asserted violent misdemeanor and felony offenses committed by a person's current or former spouse, current or former cohabitant, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law. Dating violence means violence in a romantic or intimate relationship. Whether there was such relationship is gauged by its length, type, and frequency of interaction.

Warning signs of domestic and dating violence - Abusive behaviors are typically repetitive and used to maintain power and control over an intimate partner. These behaviors include belittling, humiliating, arousing fear, forcibly blocking or preventing a partner, and physical harm. For more information about signs of unhealthy relationships or examples of warning signs of relationship violence please visit www.thehotline.org.

Domestic Violence

Includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person cohabitating with or has cohabitated with the victim as a spouse, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Stalking

A repeated course of conduct directed at a specific person that would cause a reasonable person to fear for her, his, or others' safety, or to suffer substantial emotional distress. Stalking and cyberstalking are crimes. A stalker can be someone known or unknown. More often than not it is someone a person has former involvement with or dated. Most reported stalking cases involve men stalking women, but any gender can experience stalking.

Warning signs of stalking - Stalkers may call and hang-up, call excessively, follow you, appear unexpectedly, send unwanted texts, and leave unwanted messages, letters, or gifts. They may use hidden cameras, GPS systems, phones and social media to track location.

If you suspect you are being stalked, call 911, contact FCIM Administration, or other crisis or domestic violence support programs can help you create a safety plan or secure a court order of protection. Remember to keep any evidence of the stalking (dates, times, places, texts, social media, etc.) and don't communicate with the stalker or respond to attempts to contact you.

Bystander

A witness to an occurrence of violence, threat, or potential misconduct. A common misconception can occur when a group of people witness an event: they often assume someone else will contact the authorities, report it, or intervene. Don't make this assumption. Call 911, submit a report and/or talk to someone at the College.

Bystander intervention can prevent violence! Step Up. Just Act. Do something. Watch out for your friends and classmates. If you come across someone who looks like they are in trouble,

check in with them and make sure they are ok. If you see someone doing something sketchy, say something. Three common ways to intervene:

Delegation approach – Locate the person’s friends or the Police to have them intervene. Ask for others to take certain actions, for example ask them to not leave the person out of their sight.

Direct approach – If you feel comfortable, make your presence known. “Hey, I’m concerned for your safety, do you need help?” or “hey are you okay?” or “You know what, it’s time for us to go.”

Distracting approach – Make something up to either get the person to safety (e.g., “your sister is on the phone for you”) or to get the aggressor to leave the situation, For example, “hey, buddy your car is being towed,” or “I dropped my phone, can you help me move this couch?”

Sexual Assault Emergency Action Steps

1. Get to a safe place as soon as possible.
2. Call 911 to get immediate help.
3. Seek immediate medical attention, preferably at a hospital emergency room accompanied by and/or a trusted friend. Medical personnel are trained to perform an optional "rape kit" exam, where they are able to gather evidence for your case.
4. If you do not want to report to the police now, it is still important to have a medical exam to make sure things are okay. They can test you for injuries, pregnancy and sexually transmitted diseases (STD’s), each step only with your consent, at no cost to you.
5. It’s best not to shower, change clothes, or clean up before going to the hospital.

Survivors Rights and Options

If you are a Survivor, Witness, Bystander, or Third-Party to sexual misconduct:

- You have the right to report or not report the incident to the College, to law enforcement, or both.
- You have the right to privacy in reporting. Reporting the incident to the College is recommended for survivors who wish to maintain the highest level of confidentiality allowable by law. Title IX and law enforcement officials have additional legal reporting obligations and cannot guarantee full confidentiality.
- You have the right to request and receive assistance from College employees in notifying law enforcement.

Assistance is available regardless of whether a person chooses to report. Assistance may include, but is not limited to:

- providing on-campus counseling and direct support with referrals
- adjusting class schedules or on-campus work schedules
- ensuring security before or after a class session,
- providing information regarding “no contact orders” and orders of protection

Reporting

Survivors of sexual misconduct, sexual violence, sexual assault, sexual harassment, dating violence, domestic violence, or stalking are encouraged to report these incidents to FCIM Administration or the police by dialing 911, or to seek immediate assistance by going to the emergency room. It is always the survivor's choice whether to make a report.

Confidentiality for all reporting will be honored to the fullest extent possible so long as the safety of the survivor, other students, or the campus community is not compromised. Reporting the incident to the FCIM Administration and/or the police is recommended for survivors who wish to maintain the highest level of confidentiality allowable by law. A person who chooses to request the strictest of confidentiality should understand that it may compromise the ability of the investigation team to fully gain information regarding the case from witnesses or the alleged offender.

College Resources

FCIM Administration
(407) 888-8689

FCIM Security Reporting Program
Safety@fcim.edu

Community Resources

Police: dial 911 from any location.

National Domestic Violence Hotline
1-800-799-7233
www.thehotline.org

National Sexual Assault Hotline
1-800-656-4673
www.rainn.org/get-help

Survivors of Incest Anonymous
410-893-3322
www.siaawso.org

Harassment, Discrimination and Sexual Misconduct Policy and Procedures

Florida College of Integrative Medicine is committed to a learning and working environment in which all individuals are treated with respect and dignity. Therefore, discrimination, harassment and sexual misconduct in any form will not be tolerated and the College requires that all relationships among board members, employees and/or students be free of discrimination and harassment.

It is the policy that no student, employee, visitor or board member be subjected to harassment, discrimination or sexual misconduct based on race, color, creed, religion, gender, sexual orientation, age, national origin, veteran's status, marital status, disability or any other characteristic protected by law while on College premises or in connection with an individual's education or employment at the College. Violations of this policy will result in appropriate discipline, including dismissal or expulsion.

Harassment and discrimination include, but are not limited to, conduct that has the effect of substantially interfering with an individual's educational or job performance, creates an intimidating, hostile or offensive educational or employment environment, or that otherwise adversely affects an individual's educational or employment opportunities.

Hostile environment harassment or discrimination consists of unwelcome verbal or physical behavior that is sufficiently severe or persistent or pervasive and objectively offensive that alters the conditions of education or employment. A hostile environment may be determined to have been created based on the frequency of the conduct and/or its severity.

Sexual harassment includes unwelcome conduct of a sexual nature and includes sexual advances, requests for sexual favors or other verbal, non-verbal or physical conduct of a sexual nature. The behavior becomes harassing and actionable when submission to such conduct is made either explicitly or implicitly a term or condition of a person's educational progress or employment, or when submission to or rejection of such conduct by an individual is used as the basis for an educational or employment decision affecting that person.

Sexual misconduct is a broader term that encompasses all forms of unwelcome, non-consensual sexual behavior including, but not limited to, rape, sexual assault, sexual abuse, dating violence, domestic violence, stalking and gender-based harassment or discrimination. Examples may include actions that are sexually exploitative or degrading, retaliatory and/or abusive acts directed toward former relationship partners, or retaliatory/abusive actions directed toward someone who has rejected the efforts of another to establish a relationship.

Consent is defined as a freely given agreement to the act of sexual penetration or sexual conduct in question. Lack of verbal or physical resistance or submission resulting from the use of force or threat of force shall not constitute consent. Consent to past sexual activity does not constitute consent to future sexual activity and consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person. A person's manner of dress does not constitute consent. Consent can be revoked or withdrawn at any time. Consent to sexual activity cannot be made or assumed if the person is unable to understand the nature of the activity or give knowing consent due to circumstances including, but not limited to, the following:

- The person is incapacitated due to the use or influence of alcohol or drugs;
- The person is asleep or unconscious;
- The person is under age; or
- The person is incapacitated due to a mental disability.

Consensual sexual relationships in situations where one individual has power or authority over another are unethical, strongly discouraged and may result in claims of sexual harassment when the relationship ends and/or may give rise to complaints by others of favoritism while the relationship continues. Examples of such relationships may include: a faculty member and his/her student, a supervisor and a subordinate, or a coach and team player. If such a sexual consensual relationship occurs, the individual with the direct supervisory or evaluative responsibilities must bring the relationship to the timely attention of his or her supervisor, and will likely result in the necessity to remove the employee from the supervisory or evaluative responsibilities, or transfer the student from under the supervision or evaluation of the individual with whom they have established the consensual relationship. Failure to self-report such relationships to a supervisor as required can result in disciplinary action for an employee.

Harassment, discrimination and sexual misconduct on the basis of any other protected characteristic are also strictly prohibited and include verbal or physical conduct that is severe or persistent or pervasive and objectively offensive and directed toward an individual based on race, color, creed, religion, gender, sexual orientation, age, national origin, veteran's status, marital status, disability or any other characteristic protected by federal or state of Florida law and has the effect of substantially interfering with an individual's educational or job performance, creating an intimidating, hostile or offensive educational or employment environment, or otherwise creates limits or denies an individual's educational or employment opportunities.

Harassment, discrimination and sexual misconduct apply to the conduct of a board member towards an employee, student or other board member; an employee towards a student; a student towards an employee; a student towards another student; a supervisor towards a subordinate; an employee towards another employee; a volunteer, independent contractor, or authorized campus visitor towards an employee or student; or an employee towards an applicant for employment. Harassment, discrimination and sexual misconduct are prohibited regardless of the fact that the complainant and alleged offender are the same employee group and/or position level. If directly related to College activities, this policy may be applied to conduct outside the College as well as on College premises.

Retaliation against a reporting party for filing a complaint of harassment, discrimination or sexual misconduct or against anyone participating in or thought to have reported or participated in a report or investigation of harassment, discrimination or sexual misconduct is considered a form of discrimination and is strictly prohibited by this policy and by federal and state law. Claims of retaliation will be treated in the same manner as other claims of harassment, discrimination or sexual misconduct.

This policy may be revised by action of the Supervisory Board or by the enactment of a new or amended federal or state of Florida law. If the policy is revised due to a new or amended federal or state law, the board will be informed of this type of change at the next regularly scheduled board meeting. Appropriate procedures to implement this policy will be established in accordance with federal and state of Florida law and will be distributed to the board on an annual basis or as revisions are made. Policy in effect at the time of the offense will apply even if the Policy is changed subsequently, unless the parties consent to be bound by the current Policy. Any

revisions will be noted in the online version of the Policy and procedures will include the date of revision and will highlight the specific revisions for three months following the date of the revision.

General Objective

All College employees and board members are responsible to address and report any knowledge of harassment, discrimination or sexual misconduct. Employees and board members who have been put on notice of potential harassment, discrimination or sexual misconduct should report such conduct to FCIM Administration.

Any supervisor, manager or administrator who becomes aware of potential violations of Sexual Misconduct Policy, Harassment, Discrimination and Sexual Misconduct, in the context of his/her role, is required to immediately contact the FCIM Administration. These provisions apply whether the harassment, discrimination or sexual misconduct has taken place in another department or by an individual who is not a College student or employee.

Process for Addressing Complaints of Harassment, Discrimination, Sexual Misconduct

Florida College of Integrative Medicine has adopted the following definition as a guide to consent:

Consent is defined as a freely given agreement to sexual penetration or sexual conduct in question. Lack of verbal or physical resistance or submission resulting from the use of force or threat of force shall not constitute consent. Consent to past sexual activity does not constitute consent to future sexual activity and consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person. A person's manner of dress does not constitute consent. Consent can be revoked or withdrawn at any time. Consent to sexual activity cannot be made or assumed if the person is unable to understand the nature of the activity or give knowing consent due to circumstances including, but not limited to, the following:

- The person is incapacitated due to the use or influence of alcohol or drugs;
- The person is asleep or unconscious;
- The person is under age; or
- The person is incapacitated due to a mental disability.

Florida College of Integrative Medicine will act on any formal or informal complaint or notice of violation of the policy on harassment, discrimination or sexual misconduct that is received by the FCIM administration.

The procedures described below will apply to all reports involving board members, employees and students. Redress and requests for corrective actions for reports brought against non-members of the campus community are also covered by these procedures.

Process for Resolving Complaints of Harassment, Discrimination, Sexual Misconduct

Hearing Committee

The President, in consultation with the Director of Campus Safety, appoints the Hearing Committee. Members of the Hearing Committee are announced in an annual notification of this Policy and procedures to the campus community. Members of the Hearing Committee can serve in any of the following roles at the direction of the President:

- To provide sensitive intake and process guidance of complaints.
- To serve in a mediation role in conflict resolution.
- To investigate complaints.
- To act as advisors to those involved in complaints.
- To serve on hearing panels for complaints.
- To serve on appeal panels for complaints.

In the event of a conflict or vacancy on the Hearing Committee, the President, in consultation with the Director of Campus Safety, will appoint an alternate designee.

Filing a Report

Any board member, employee, student, guest or visitor who believes that the Policy has been violated should contact the Director of Campus Safety or a member of the Hearing Committee. It is also possible for employees to notify a supervisor, or for students to notify an administrator or faculty member, or any member of the campus community to contact the police. These individuals will in turn notify the Title IX Coordinator. The College website also includes a reporting form at www.fcim.edu/policies which may serve to initiate a report.

All employees receiving reports of a potential violation of the Policy are expected to promptly contact the Title IX Coordinator within 24 hours of becoming aware of a report or incident. All initial contacts will be treated with the maximum possible privacy: specific information on any complaints received by any party will be reported to the Title IX Coordinator, but, subject to the College's obligation to redress violations, every effort will be made to maintain the privacy of those initiating a report of a complaint. In all cases, Florida College of Integrative Medicine will give consideration to the reporting party with respect to how the report is pursued but reserves the right when necessary to protect the campus community and to investigate and pursue a resolution when a reporting party chooses not to initiate or participate in a formal investigation.

Report Intake

Following receipt of notice or a report, the Title IX Coordinator or designee will inform the reporting party of his/her right to an advisor of his/her choice, who may be present at all meetings.

The Title IX Coordinator or designee will make an initial determination whether a policy violation may have occurred and/or whether conflict resolution may be appropriate. The report

does not proceed to investigation if the reported incident does not appear to violate the policy or if conflict resolution is desired by the reporting party and appears appropriate given the nature of the alleged behavior. A full investigation will be pursued if there is an alleged policy violation or if there is evidence of a pattern of misconduct or a perceived threat of further harm to the campus community or any of its members.

Investigation

If a reporting party wishes to pursue a formal report or if the College, based on the alleged policy violation, wishes to pursue a formal investigation, then the Title IX Coordinator or designee appoints Hearing Committee members to conduct the investigation. The Title IX Coordinator or designee reserves the right to appoint an external party or agency to conduct the investigation, in consultation with the President. Investigation of reports brought directly by those alleging harm will be completed expeditiously. Investigation may take longer when initial reports fail to provide direct first-hand information. The College may undertake a short delay to allow evidence collection when criminal charges on the basis of the same behaviors that invoke this process are being investigated. College action will not be altered or precluded on the grounds that civil or criminal charges involving the same incident have been filed or that charges have been dismissed or reduced. All investigations will be thorough, reliable and impartial and will entail interviews with all relevant parties and witnesses, obtaining available evidence and identifying sources of expert information, if necessary. The College aims to complete all investigations within a 60 business day time period, which can be extended as necessary for appropriate cause by the Title IX Coordinator or designee with notice to the parties.

Interim Remedies

If, in the judgment of the Title IX Coordinator or designee, the safety or well-being of any member(s) of the campus community may be jeopardized by the on-campus presence of the responding party or the ongoing activity of a student organization whose behavior is in question, the Title IX Coordinator or designee may provide interim remedies intended to address the short-term effects of harassment, discrimination, sexual misconduct and/or retaliation, i.e., to redress harm to the reporting party/injured individual and the campus community and to prevent further violations. These remedies may include referral to counseling, education to the campus community, altering the class schedule of a student responding party (or the student reporting party, if desired), altering work arrangements for employees, , implementing contact limitations between the parties, offering adjustments to academic deadlines, course schedules, etc.

The College may do an interim suspension on a student, employee or organization pending the completion of a Hearing Committee investigation. The Title IX Coordinator or designee has sole discretion to implement or stay an interim suspension under the Policy, and to determine its conditions and duration. Violation of an interim suspension under this Policy will be grounds for expulsion or termination.

During an interim suspension, a student or employee may be denied access to Florida College of Integrative Medicine campus, facilities and/or events. As determined by the Title IX Coordinator or designee, this

restriction includes classes and/or all other Florida College of Integrative Medicine activities or privileges for which the student or employee might otherwise be eligible. At the discretion of the Title IX Coordinator or designee, alternative coursework options may be pursued to ensure as minimal an impact as possible on the student responding party.

Resolution

During or upon the completion of investigation, the investigator(s) will meet with the Title IX Coordinator or designee. Based on that meeting, the Title IX Coordinator or designee will make a decision on whether there is reasonable cause to proceed with the investigation. If the Title IX Coordinator or designee decides that no policy violation has occurred or that the preponderance of evidence (i.e., whether it is more likely than not that the responding party committed each alleged violation) does not support a finding of a policy violation, then the process will end unless the reporting party requests that the Title IX Coordinator or designee makes an extraordinary determination to re- open the investigation or to forward the matter for a hearing. This decision lies in the sole discretion of the Title IX Coordinator or designee. If there is reasonable cause, the Title IX Coordinator or designee will direct the investigation to continue, or if there is a preponderance of evidence of a violation, then the Title IX Coordinator or designee may recommend conflict resolution, a resolution without a hearing or a formal hearing, based on the following criteria:

Conflict Resolution

Conflict resolution is often used for less serious, yet inappropriate, behaviors and is encouraged as an alternative to the formal hearing process to resolve conflicts. The Title IX Coordinator or designee will determine if conflict resolution is appropriate based on the willingness of the parties and the nature of the conduct at issue. In a conflict resolution meeting, a Hearing Committee member will facilitate a dialogue with the parties to an effective resolution, if possible. Sanctions are not possible as the result of a conflict resolution process, though the parties may agree to appropriate remedies. The Title IX Coordinator or designee will keep records of any resolution that is reached and failure to abide by the resolution can result in appropriate corrective actions.

Conflict resolution will not be the primary resolution mechanism used to address complaints of sexual misconduct or violent behavior of any kind or in other cases of serious violations of policy, though it may be made available after the formal process is completed should the parties and the Title IX Coordinator or designee believe that it could be beneficial. It is not necessary to pursue conflict resolution first in order to make a formal Hearing Committee report and anyone participating in conflict resolution can stop that process at any time and request a formal hearing, if deemed necessary.

Resolution Without a Hearing

Resolution without a hearing can be pursued for any behavior that falls within the Policy at any time during the process. The Title IX Coordinator or designee will provide written notification of a report to any member of the Florida College of Integrative Medicine community who is

accused of an offense of harassment, discrimination, sexual misconduct or retaliation. The responding party may choose to admit responsibility for all or part of the alleged policy violation(s) at any point in the process. If such admission is made, the Title IX Coordinator or designee will render a finding that the responding party is in violation of Florida College of Integrative Medicine policy for the admitted conduct, and will normally proceed to convene a formal hearing on any remaining disputed violation(s).

For admitted violations, the appropriate Co-chair of the Hearing Committee will recommend an appropriate sanction or corrective action in consultation with the Title IX Coordinator or designee. If the sanction or corrective action is accepted by both parties, the Title IX Coordinator or designee will implement it and act promptly and effectively to remedy the effects of the admitted conduct upon the injured individual and the campus community. If either party rejects the sanction or corrective action, a hearing will be held on the sanction/corrective action only, according to the following Hearing Committee procedures

Formal Hearing

For any reports that are not appropriate for conflict resolution or which are not resolved through conflict resolution or are without a hearing, the Title IX Coordinator or designee will initiate a formal hearing or for individuals for whom no hearing process is available, will refer his/her findings to an appropriate Title IX designee.

Formal Hearing Committee Procedure

Hearing Panels

The Title IX Coordinator or designee will appoint a non-voting Hearing Panel Chair and three members of the Hearing Committee to the Hearing Panel, none of whom have been previously involved with the report. Hearing Committee members who served as investigators will be witnesses in the hearing of the report and therefore may not serve as Hearing Panel members.

Notification of Charges

At least one week prior to the hearing, or as far in advance as is reasonably possible if an accelerated hearing is scheduled with the consent of the parties, the Hearing Panel Chair will send written notification to the parties with the following information. Once mailed, emailed and/or received in-person, notice will be presumptively delivered. The letter will contain:

- A description of the alleged violation(s), a description of the applicable procedures and a statement of the potential sanctions or corrective actions that could result.
- The time, date and location of the hearing and a reminder that attendance is mandatory, superseding all other campus activities. If any party does not appear at the scheduled hearing, the hearing will be held in their absence.

Hearing Procedures

Hearing Panel hearings will be convened, usually within one to two weeks after the completion of the investigation, and will be conducted in private. Hearings for possible violations that occur near or after the end of an academic term will be held immediately after the end of the term or on any work day, Monday through Friday, when the College is open to meet the resolution timeline followed by the College and remain within the 60-day goal for resolution.

The Hearing Panel has the authority to hear all collateral misconduct, meaning that it hears all allegations of harassment, discrimination, sexual misconduct and retaliation, but also may hear any additional alleged policy violations that have occurred in concert with the discrimination, harassment, sexual misconduct or retaliation, even though those collateral allegations may not specifically fall within Hearing Committee jurisdiction. Accordingly, investigations should be conducted with as wide a scope as necessary.

The Chair, in consultation with the parties and investigator(s), may decide in advance of the hearing that certain witnesses do not need to be physically present if their testimony can be adequately summarized by the investigator(s) during the hearing. All parties will have ample opportunity to present facts and arguments in full and question all present witnesses during the hearing, though formal cross-examination is not used between the parties.

Hearings are recorded for purposes of review in the event of an appeal. Hearing Committee members, the parties and/or the persons who initiated the action and appropriate administrator of the College will be allowed to listen to the recording in a location determined by the Title IX Coordinator or designee. No person will be given or be allowed to make a copy of the recording without permission of the Title IX Coordinator or designee. Persons given access to the recording will be required to sign an agreement confirming that he/she will protect the privacy of the information contained in the recording.

Decisions

The Hearing Panel will deliberate in closed session to determine whether the responding party is responsible or not responsible for the violation(s) in question. The Hearing Panel will base its determination on a preponderance of the evidence (i.e., whether it is more likely than not that the accused individual committed each alleged violation). If a responding party or organization is found responsible by a majority of the Panel, the Panel will recommend appropriate sanctions to the Title IX Coordinator or designee.

The Hearing Panel Chair will prepare a written deliberation report and deliver it to the Title IX Coordinator or designee detailing the finding, the rationale cited by the Panel in support of its determination and any information the Hearing Panel excluded from its consideration and why. The report should conclude with any recommended sanctions. This report should not exceed two pages in length and must be submitted to the Title IX Coordinator or designation within two (2) days of the end of deliberations.

The Title IX Coordinator or designee will inform the reporting party and the responding party of the final determination within three (3) business days of the hearing. Notification will be made in writing and may be delivered by one or more of the following methods: in person; mailed to the

local or permanent address of the parties as indicated in official Florida College of Integrative Medicine records; or emailed to the parties' College-issued email account. Once mailed, emailed and/or received in-person, notice will be presumptively delivered.

Sanctions

Sanctions or corrective actions will be recommended by the Hearing Panel. Factors considered when determining a sanction or corrective action may include:

- The nature, severity of and circumstances surrounding the violation;
- An individual's disciplinary history;
- Previous reports or allegations involving similar conduct;
- Any other information deemed relevant by the Hearing Panel;
- The need for sanctions/corrective actions to bring an end to the harassment, discrimination, sexual misconduct and/or retaliation;
- The need for sanctions or corrective actions to prevent the future recurrence of harassment, discrimination, sexual misconduct and/or retaliation;
- The need to remedy the effects of the harassment, discrimination, sexual misconduct and/or retaliation on the reporting party and the campus community.

Student Sanctions

Corrective actions for a student who has engaged in harassment, discrimination, sexual misconduct and/or retaliation may include, but are not limited to, probation, suspension, expulsion or any other sanction as deemed appropriate by the College.

Employee Sanctions

Corrective actions for an employee who has engaged in harassment, discrimination, sexual misconduct and/or retaliation may include, but are not limited to, disciplinary warning, required counseling or training, demotion, suspension with pay, suspension without pay and termination of employment.

Withdrawal or Resignation While Charges Pending

Students: The College does not permit a student to officially withdraw if that student has a charge pending for violation of the Policy. Should a student decide to leave and not participate in the investigation and/or hearing, the process will nonetheless proceed in the student's absence to a reasonable resolution and that student will not be permitted to return to Florida College of Integrative Medicine unless all sanctions have been satisfied.

Employees: Should an employee resign while charges are pending, the records of the Title IX Coordinator or designee will reflect that status. The process will nonetheless proceed without the employee's participation to resolution. In the event the employee is found in violation, the Title IX Coordinator or designee will act to promptly and effectively remedy the effects of the conduct upon the injured individual and the campus community.

Appeals

An appeal will be limited to procedural review except when substantive evidence is presented or when the determination involves suspension or expulsion. All requests for appeal considerations must be submitted in writing to the Title IX Coordinator or designee within three (3) business days of the delivery of the written finding of the Hearing Committee.

The Title IX Coordinator or designee will appoint a three-member Appeals Panel from the Hearing Committee, none of whom have been previously involved with the report or the investigation to consider all appeal requests. Any party may appeal, but appeals are limited to the following:

- If a procedural error or omission occurred that significantly impacted the outcome of the hearing (e.g. substantiated bias, material deviation from established procedures, etc.).
- To consider new evidence, unknown or unavailable during the original hearing or investigation, that could substantially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included.

The Appeals Panel will review the appeal request(s). The original finding and sanction or corrective actions will stand if the appeal is not timely or is not based on the grounds listed above, and such decision is final. When any party requests an appeal, the other party (parties) will be notified and joined in the appeal. The party requesting appeal must show that the grounds for an appeal request have been met and the other party or parties may show the grounds have not been met or that additional grounds are met. The original finding and sanction are presumed to have been decided reasonably and appropriately.

For reports in which the Appeals Panel finds that at least one of the grounds is met, and proceeds, additional principles governing the hearing of appeals include the following:

- Decisions by the Appeals Panel are to be deferential to the original decision, making changes to the finding only when there is clear error and to the sanction/corrective action only if there is a compelling justification to do so. Appeals are not intended to be full re-hearings of the report and investigation. In most cases, appeals are confined to a review of the written documentation or record of the original hearing and pertinent documentation regarding the grounds for appeal. Appeals granted based on new evidence should normally be remanded to the original Hearing Panel for reconsideration. Other appeals may be remanded to the original Hearing Panel at the discretion of the Title IX Coordinator or designee.
- Sanctions imposed are implemented as soon as practicable unless the Title IX Coordinator or designee stays their implementation in extraordinary circumstances, pending the outcome of the appeal.
- The Title IX Coordinator or designee will normally, after conferring with the Appeals Panel, render a written decision on the appeal to all parties within three (3) business days from hearing of the appeal.
- All parties should be informed whether the grounds for an appeal are accepted and the

- results of the appeal decision.
- Once an appeal is decided, the outcome is final. Further appeals are not permitted.

Failure to Complete Sanctions/Comply with Corrective Actions

All parties are expected to comply with sanctions/corrective actions within the time frame specified by the Title IX Coordinator or designee. Failure to follow through on sanctions/corrective actions by the date specified, whether by refusal, neglect or any other reason, may result in additional sanctions/corrective actions, suspension, expulsion and/or termination from the College and may be noted on a student's official transcript or an employee's official personnel file. A student suspension will only be lifted when compliance is achieved to the satisfaction of the Title IX Coordinator or designee. Sanctions involving suspension or termination of an employee are subject to the provisions of the appropriate College procedure, collective bargaining agreement, approval by the Board of Trustees and/or state and federal law.

Records

In implementing this policy, records of all reports, resolutions and hearing will be kept by the Title IX Coordinator or designee indefinitely.

Revision

These procedures will be updated by the Title IX Coordinator or designee at any time in accordance with federal and state of Florida law. The Title IX Coordinator or designee may make minor modifications to procedure that do not materially jeopardize the fairness owed to any party. However, the Title IX Coordinator or designee may also vary procedures with notice (on the institutional website with appropriate date of effect identified) upon determining that changes to law or regulation require alterations not reflected in the current procedure. Procedures in effect at the time of its implementation will apply. Policy in effect at the time of the offense will apply even if the Policy is changed subsequently, unless the parties consent to be bound by the current Policy.

Crime Victims Bill of Rights

The Crime Victims Bill of Rights specifically applies to victims of the following crimes:

- Homicide
- Assault and Battery
- Kidnapping, False Imprisonment and related offenses
- Reckless Conduct
- Cruelty to Children
- Feticide
- Stalking/Aggravated Stalking
- Cruelty to a Person 65 Years of Age or Older
- All Sexual Offenses
- Burglary

- Arson, Bombs and Explosives
- Theft
- Robbery
- Forgery, Deposit Account Fraud, Illegal Use of Financial Transaction Cards, Other Fraud Related Offenses, Computer Crimes, & Identity Theft
- Sale or Distribution of Harmful Materials to Minors
- Elder Abuse
- Homicide by Vehicle
- Feticide by Vehicle
- Serious Injury by Vehicle

In general, after the crime occurs and is reported, and upon initial contact with a victim, law enforcement and court personnel must advise him or her of the following:

- That it is possible that the accused may be released from custody prior to trial;
- That victims have certain rights during various stages of the criminal justice system;
- That victims have the right to refuse or agree to be interviewed by the accused, the accused's attorney, or anyone who represents or contacts you on behalf of the accused;
- That victims may have available to them community-based victim service programs and that more information may be obtained by contacting the Governor's Victim Assistance Helpline at 1-800-338-6745.

Further, Florida College of Integrative Medicine complies with Florida law in recognizing orders of protection, such as Restraining Orders, Temporary Protective Orders, Stalking Orders, etc. Any person who obtains an order of protection from Florida or any other state should provide a copy to Director of Campus Safety and the Office of the Title IX Coordinator. The Florida College of Integrative Medicine recognizes protective orders from all states with the understanding that violations of protective orders from states other than Florida will be violations of the originating state. A complainant may then meet with the Title IX Coordinator to develop a plan for the FCIM Administration, applicable College departments, and the victim to reduce risk of harm while on campus or coming and going from campus. This plan may include, but is not limited to: escorts, special parking arrangements, changing classroom location or allowing a student to complete assignments from home, etc.

To the extent of the victim's cooperation and consent, College offices; including Student Services, Title IX Coordinator or Deputy Coordinators, FCIM Administration, and any other applicable departments will work cooperatively to ensure that the complainant's health, physical safety, work and academic status are protected, pending the outcome of a formal College investigation of the complaint. For example, if reasonably available, a complainant may be offered changes to academic, living, or working situations in addition to counseling, health services and assistance in notifying appropriate law enforcement. Additionally, personal identifiable information about the victim will be treated as confidential and only shared with persons with a specific need to know who are investigating/adjudicating the complaint or

delivering resources or support services to the complainant. The College does not publish the name of crime victims nor house identifiable information regarding the victims.

Resources for victim of Domestic Violence, Dating Violence, Sexual Assault & Stalking

Resources available to persons who report being the victim of sexual assault, domestic violence, dating violence, or stalking, include (but are not limited to):

Resource	Phone Number	Website
Avita (Mental Health Assistance)	800-525-8751	http://www.gamtns.org/about/locations.php
Children’s Center for Hope and Healing	770-532-6530	http://www.hopeandhealingga.org/
Choices Pregnancy Care Center	770-535-1245	http://www.choicespregnancy.org/
Dept. of Family & Children Services	706-532-5298	http://www.hallcounty.org/agencies/dfacs.asp
Family Law Information Center	770-531-2463	http://www.hallcounty.org/judicial/jud_FLIC.asp
Gateway Domestic Violence Center	Crisis Line: 770-536-5860	http://www.gatewaydvcenter.org/
NOA (No One Alone)	706-864-1986	www.noonealone.org
Rape Response	770-503-7273	http://www.raperesponse.com/
Department of Justice	202-514-2000	http://www.ovw.usdoj.gov/sexassault.htm
Department of Education, Office of Civil Rights	800-421-3481	http://www2.ed.gov/about/offices/list/ocr/index.html
National Center for Victims of Crime	800-394-2255 (FYI-CALL)	http://www.victimsofcrime.org/
National Domestic Violence Hotline	800-799-7233	http://www.thehotline.org/
National Teen Dating Abuse Helpline	866-331-9474	www.loveisrespect.org
Planning for Healthy Babies	877-744-2101 (P4HB101)	http://www.p4hb.org/
Rape, Abuse and Incest National Network	800-656-4673 (HOPE)	https://www.rainn.org/

Confidentiality

Students reporting alleged sexual assault should understand that certain College officials are required to report and/or investigate incidents of alleged sexual assault. Students should seek a College official to make formal reports of incidents (Academic Dean, FCIM Administration, Human Resources, or other appropriate department). This report will serve as official notification to the College. Confidentiality will be maintained to the point that only people who need to know will be told and information will be shared only as necessary with investigators, witnesses, and the accused individual.

Some on-campus resources can offer confidentiality, sharing options, and advice without any obligation to tell or report, unless the student directs. If an alleged victim desires the details of the incident to be kept confidential, the student should speak with on-campus mental health counselors in student counseling, medical staff in Student Health Services, or off-campus rape crisis resources such as Rape Response who can maintain confidentiality. Campus counselors are available to help students free of charge and are available on an emergency basis.

Sanctions and Protective Measures

In all cases, investigations that result in a finding of more likely than not that a violation of the Student Code of Conduct policy, Student Sexual Misconduct policy, or Employee Code of Conduct occurred will lead to the initiation of disciplinary procedures against the accused individual. College sanctions including, Expulsion, Conduct Suspension, Conduct Probation, Reprimand (oral or written), Restrictions, and Restitution for students and Verbal Disciplinary Action, Written Disciplinary Action, Suspension without Pay Action, and Dismissal Action for employees may be imposed upon those determined to have violated this policy. The College may implement protective measures following the report of domestic violence, dating violence, sexual assault, and/or stalking which may include some or all of the following actions: escorts, change of classes, change of living space, change of workplace, etc. Sexual assault, domestic violence, dating violence, and stalking are criminal acts which also may subject the perpetrator to criminal and civil penalties under federal and state law.

The Title IX Coordinator will determine whether interim interventions and protective measure should be implemented, and, if so, take steps to implement those protective measures as soon as possible. Examples of interim protective measures include but are not limited to: an order of no contact, residence hall relocation, adjustment of course schedules, a leave of absence, or reassignment to a different supervisor or position.

These remedies may be applied to one, both, or multiple parties involved. Violations of the Title IX Coordinator's directives and/or protective measures will constitute related violations that may lead to additional disciplinary action. Protective measures imposed may be temporary pending the results of an investigation or may become permanent as determined by Florida College of Integrative Medicine.

Emergency Evacuation Procedures and Policies

Emergency Notification System

How will I be notified of an emergency?

Currently the Florida College of Integrative Medicine has adopted three methods of communication for dissemination of information regarding emergencies. Those methods include:

1. FCIM Alert
2. Website Notification (<http://FCIM.edu>)
3. FCIM Email

FCIM Alert

What is FCIM Alert? FCIM Alert is the primary emergency messaging system that delivers text messages, voice calls, e-mails, and desktop computer alerts directly to your cell phone or computer in the event of severe weather, emergency evacuation, or other campus emergency.

Am I automatically enrolled to receive the emergency text messages? No. Students and employees will have register with FCIM Alert in order to receive FCIM Alert.

What does it cost? The only cost is the amount your cell phone company may charge you to receive a text message or phone call.

What If my cell phone number changes? You must update your cell phone number by contacting FCIM Alert.

Can my family receive FCIM Alerts? Yes. The FCIM Alert system allows student to include up to 2 phone numbers.

What kinds of messages will I get through FCIM Alert? We will only send you a message in the event of severe weather, a campus emergency, an emergency campus closing/evacuation, or other emergency in which we believe your wellbeing is in danger. The system WILL NOT be used for routine communications.

How are messages delivered? Messages are delivered via text, voice phone calls, FCIM e-mail, and/or FCIM desktop computer alerts.

Important Information: To sign up for FCIM Alert phone please use your phone to text **@fcimalert to 81010**.

Website Notifications

FCIM College will update FCIM websites with emergency information and updates as they become available.

FCIM Email System

FCIM College will email to student and faculty's College email account with emergency information and updates as they become available.

Emergency Evacuation Procedures

What conditions may warrant evacuation of a building?

A wide variety of emergencies may cause an evacuation such as Fire, Bomb Threat, Hazardous Materials Spill, Hostile Intruder, Utility Failure, etc. In some instances you may have time to prepare, while other situations might call for an immediate evacuation.

Planning ahead is vital to ensuring that you can evacuate quickly and safely, no matter what the circumstances.

What should I know about the building evacuation plan?

- KNOW the evacuation plan of the building and where to find it. (consult building coordinator)
- KNOW the location of all exits for the building
- KNOW the locations of emergency equipment (i.e., fire extinguishers, pull stations, etc.)

What should I do if the fire alarm has not already been activated due to smoke, heat or fire, or there is no evidence of fire or explosion threat in the building, but I discover an event or condition that may warrant building evacuations?

- NOTIFY FCIM Administration
- Activate the fire alarm
- INFORM the building coordinator of the event or conditions if possible

What should I do when I hear a fire alarm, or get an order to evacuate without an activated alarm?

- EVACUATE the building using the nearest exit
- PROCEED to a pre-determined assembly area for the building and remain there
- until you are told to re-enter by the emergency personnel in charge
- DO NOT IMPEDE access of emergency personnel to the area
- INFORM the emergency personnel of the event, conditions, and location of individuals who require assistance and have not been evacuated

Individuals Requiring Assistance

What should I know as an individual requiring assistance?

It is recommended that individuals requiring assistance prepare for emergencies ahead of time by:

- LEARNING the locations of exit corridors and exit ways
- PLANNING an escape route
- SHOWING a co-worker or instructor how to assist you in case of emergency

What should I do as an individual requiring assistance during a building evacuation?

- SEEK REFUGE near the closest exit and request assistance from others

What should I know in order to help individuals requiring assistance?

- BE FAMILIAR with the people requiring assistance who are routinely in your work area.
- TO REDUCE THE RISK OF PERSONAL INJURY, attempts to carry immobilized persons are discouraged. As part of the evacuation route, the following procedures are to be applied:
- BLIND, BUT MOBILE PERSONS, should first be moved out of the rush of traffic, and then promptly assisted to the nearest exit
- DEAF, BUT MOBILE PERSONS, may be unaware of the need to evacuate, and should be calmly advised and guided to the nearest available exit
- TEMPORARILY IMMOBILIZED PERSONS, including those wearing casts and/or using canes or crutches, should be given assistance based solely upon their ability to maneuver through doorways, temporarily immobilized persons must be assisted in the same manner as those who are permanently impaired (see below)
- PERMANENTLY IMMOBILIZED PERSONS are those who have either limited or no use of legs, and must rely upon crutches, wheelchairs, or walkers for transport in and through buildings. If they cannot easily move, they must be assisted.

What should I do to help individuals requiring assistance?

- MOVE THE PHYSICALLY IMPAIRED person quickly to reasonable safety, preferably to an enclosed room or space that smoke or flames cannot easily enter as soon as a fire alarm sounds or the order to evacuate is received by emergency or building safety personnel, by a verbal explanation so as that the person being assisted understands what is happening and why these actions are being taken
- CONTACT Police immediately if a telephone is available, and provide the following:
- The individuals name and location within the building; and
- The phone number from which the call is being made.

- If left alone, the disabled person may want to remain on the phone with Police.
- IF AVAILABLE, A COMPANION, OR OTHER RESPONSIBLE PERSON may stand by to remain with and assist the physically-challenged individual.
- INFORM emergency personnel of the exact location of the immobilized person.
- If it becomes necessary for removal from the building, trained and properly equipped emergency personnel will then carry out the removal.

What if all or part of the campus needs to be evacuated?

- Evacuation of all or part of the campus grounds will be decided by the President and announced by Coordinator of Safety Services. All persons are to immediately vacate the area in question and move to another part of the campus grounds or local assembly area as directed.

What do I do when I have evacuated the building?

- Stay in the designated assembly area until an accurate headcount is taken and permission to return to the building is given by emergency personnel in charge.

Will I receive an evacuation notification?

- There are situations where we would use the FCIM Alert system as means of evacuation notice. If this occurs, follow the instructions given by the message and alert others in your area to evacuate the building.

Seeking Shelter

When would I need to seek shelter?

- A hazardous material release, dangerous person/hostile intruder in the area, severe weather that makes travel or being outdoors dangerous, or when there is not enough safety to evacuate.

What should I know about seeking shelter?

- The basic concept is to get out of harm's way through a means of creating a barrier between you and the danger, while still maintaining safety and communication.
- The best room in a building to use for seeking shelter is in the main building, an interior room with as few windows as possible.

What should I do to safely seek shelter?

In General:

- GO inside as quickly as possible or
- PROCEED to an interior room, if already indoors
- CLOSE all doors and windows
- LOCK all windows and close all blinds and shades if there is time
- LOCK doors if advised to do so
- DO NOT use gas stoves, candles, or other fire sources due to the dangers of carbon monoxide and creating a fire hazard
- USE the phone only for emergencies

If the emergency is hazardous material spill or gas release:

- STAY low and away from windows, in high winds
- BRING a disaster kit into the room
- TURN OFF air conditioners, furnaces, and fans, if possible
- SEAL all windows, doors and air vents with plastic sheeting and duct tape, if possible or
- IMPROVISE and use what you have on hand to seal gaps so that you create a barrier between yourself and any contamination
- TURN ON a TV or radio so you can hear emergency messages

Severe Weather Emergencies

Tornados

The local county Emergency Management Agencies and College will monitor the National Weather Service for severe weather. In the event that the severe weather is in the immediate area, notifications will be made via the FCIM Alert and/or via College email communication.

If you are under a tornado warning, seek shelter immediately! Most injuries associated with high winds are from flying debris, so remember to protect your head

<i>If you are in:</i>	<i>Then:</i>
A structures (e.g. campus building)	Go to the center of a small interior room (closet, interior hallway) away from corners, windows, doors, and outside walls. Put as many walls as possible between you and the outside. Get under a sturdy table and use your arms to protect your head and neck. Put on sturdy shoes. Do not open windows.
A manufactured home or office	Get out immediately and go to a pre-identified location such as a sturdy, nearby building or a storm shelter. Mobile homes, even if tied down, offer little protection from tornadoes.

<p>The outside with no shelter</p>	<p>If you are not in a sturdy building, there is no single research-based recommendation for what last-resort action to take because many factors can affect your decision.</p> <p>Possible actions include:</p> <p>Immediately get into a vehicle, buckle your seat belt and try to drive to the closest sturdy shelter. If your vehicle is hit by flying debris while you are driving, pull over and park.</p> <p>Take cover in a stationary vehicle. Put the seat belt on and cover your head with your arms and a blanket, coat or other cushion if possible.</p> <p>Lie in an area noticeably lower than the level of the roadway and cover your head with your arms and a blanket, coat or other cushion if possible.</p> <p>In all situations:</p> <p>Do not get under an overpass or bridge. You are safer in a low, flat location. Never try to outrun a tornado in urban or congested areas in a car or truck. Instead, leave the vehicle immediately for safe shelter.</p> <p>Watch out for flying debris. Flying debris from tornadoes causes most fatalities and injuries.</p>
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Thunderstorms and Lightning

All thunderstorms are dangerous. Every thunderstorm produces lightning. While lightning fatalities have decreased over the past 30 years, lightning continues to be one of the top three storm-related killers in the United States.

If thunderstorm and lightning are occurring in your area, you should:

- Avoid contact with corded phones and devices including those plugged into electric for recharging. Cordless and wireless phones not connected to wall outlets are OK to use.
- Avoid contact with electrical equipment or cords. Unplug appliances and other electrical items such as computers and turn off air conditioners. Power surges from lightning can cause serious damage.
- Avoid contact with plumbing. Do not wash your hands, do not take a shower, do not wash dishes, and do not do laundry. Plumbing and bathroom fixtures can conduct electricity.
- Stay away from windows and doors, and stay off porches.
- Do not lie on concrete floors and do not lean against concrete walls.
- Avoid natural lightning rods such as a tall, isolated tree in an open area.
- Avoid hilltops, open fields, the beach or a boat on the water.
- Take shelter in a sturdy building. Avoid isolated sheds or other small structures in open areas.
- Avoid contact with anything metal—tractors, farm equipment, motorcycles, golf carts, golf clubs, and bicycles.
- If you are driving, try to safely exit the roadway and park. Stay in the vehicle and turn on

the emergency flashers until the heavy rain ends. Avoid touching metal or other surfaces that conduct electricity in and outside the vehicle.

Utility Failure

In the event of an electrical or plumbing failure, flooding, water leak, natural gas or propane leak call the Police.

What should I do if the utility failure causes or has the potential to cause serious danger to persons or property?

- NOTIFY the Police
- EVACUATE the building
- NOTIFY the building manager and others in the immediate area as you are exiting the building

What should I do if the buildings power is turned off and the building is not equipped with a generator or emergency lighting?

- When the electricity is turned off in a building, smoke detectors and fire alert systems no longer function. Those buildings with generators are equipped to have egress lighting and should be evacuated

What should I do if I smell propane or natural gas?

- LEAVE the area immediately
- KEEP others out of the area
- NOTIFY the Police
- EVACUATE the building
- DO NOT PULL THE FIRE ALARM!
- NOTIFY the building manager and others as you are exiting the building

Medical Emergency

Medical emergencies may occur at any time and without warning.

What do I do if there is a medical emergency occurring or one has occurred?

- Call the FCIM Administration
- Notify the local fire and/or ambulance service
- Provide your name, location, number of people injured, and description of the medical emergency
- Stay on the phone for instructions of what to do
- Stay calm and keep the patient calm as well

Fire

All incidents of unintentional/non-control burn fires will be reported to the Police immediately whether Fire Department response is required or not. All Department heads, building coordinators, and supervisors will ensure that their employees are aware of the location of the fire extinguishers and fire alarm pull boxes in their work area(s). All employees should be made aware of emergency evacuation routes for their work area, the location of the fire exits, windows (if applicable).

What should I do if I discover a fire?

- ACTIVATE THE FIRE ALARM SYSTEM by pulling one of the pull stations that are located along the exit routes, IF the alarm is not already sounding.
- FOLLOW YOUR EVACUATION ROUTE and evacuate the building through the nearest exit.
- PROCEED to the pre-determined outdoor assembly area for the building
- The Administration can assist in explaining where the assembly area is
- CALL the Police to report the fire
- REMAIN OUTSIDE in the assembly area until you have been told to re-enter the building by the emergency personnel in charge

What do I need to know about portable fire extinguishers?

- Portable fire extinguishers are installed in every building
- Familiarize yourself with the locations of the fire extinguishers and receive hands-on training.

When should I use a portable fire extinguisher?

Attempt to use fire extinguishers ONLY if the following apply:

- The fire is small and can be contained safely with a fire extinguisher
- The exit is clear and there is no imminent peril
- The proper extinguisher is readily available

How do I use a fire extinguisher?

P – pull the pin
A – aim low
S – squeeze
S – sweep

Bomb Threat

What should I know about bomb threats?

Bomb threats can be classified into two categories:

The Hoax Caller: These threats are generally motivated to create an atmosphere of panic and chaos. Generally, the motive of these callers is to disrupt the normal activities and operations to the location where the explosive device is alleged to be placed.

The Credible Caller: This caller believes that an explosive device has been or will be placed and he or she wants to warn of the threat to minimize personal injuries or property damage. The caller may be the person placing the bomb or someone who has become aware of information they believe to be credible.

What methods can I receive a bomb threat?

Most of the time, bomb threats occur over the phone, however these threats can also be made via letters, e-mail, and suspicious packages.

The Phone Threat: telephone bomb threats are the most common. A person receiving a bomb threat by phone **SHOULD NOT** disconnect the caller. Keep the caller on the phone as long as possible and get as much information as possible. Once the call is finished report the call and information to the Police.

Information you should obtain:

- When will the bomb explode?
- Where is the bomb located?
- What kind of bomb is it?
- Who is (are) the targets?
- Who is the caller and how can he or she be reached?
- Why was the bomb placed there?

The Letter Threat: Bomb threats can be received via letter or in another form of writing. If you receive this correspondence, keep all materials and contact the Police immediately. The person opening the letter should handle the document as little as possible.

The Email Threat: Email is becoming a more and more frequent source of harassing communication. Although email is not very private, experienced person can create email accounts under fictitious names and use public computers to send threats. A person receiving a bomb threat via email should contact the Police immediately. Do not delete the message.

The Suspicious Package, Letter or Other Item: Any unusual object or even a strange vehicle should be immediately reported to the FCIM Administration.

What do I do if I receive a bomb threat?

- Keep calm and keep the caller on the line as long as possible. Ask the caller to repeat the message. Record as much of the spoken words made by the person making the call as possible.
- Ask the caller for the exact location and time of possible detonation (if this information was not provided).
- Pay particular attention for any strange or peculiar noises, such as, motors running, background music and type of music, and any other noises, which might give even a remote clue as to the place from which the call is being made.
- Listen closely to the voice (male or female), quality of the voice (calm or excited), accents and speech impediments. **DO NOT HANG UP THE PHONE UNTIL THE CALLER HAS DISCONNECTED.**
- Call the Police immediately when the call has been completed, giving as much information as possible.
- If the bomb threat is directed to your building, notify FCIM Administration or other appropriate directors and proceed with an orderly evacuation of all building occupants.
- Assemble at an area away from the building or other location as directed by FCIM Administration or the Police.
- Preserve any written, electronic or recorded communications related to the bomb threat for investigation by the Police.

Earthquake

Earthquakes are sudden rolling or shaking events caused by movement under the earth's surface. Earthquakes happen along cracks in the earth's surface, called fault lines, and can be felt over large areas, although they usually last less than one minute. Earthquakes cannot be predicted.

During an Earthquake

If you are inside a building:

- Stay where you are until the shaking stops. Do not run outside. Do not get in a doorway as this does not provide protection from falling or flying objects, and you may not be able to remain standing.
- Drop down onto your hands and knees so the earthquake doesn't knock you down. Drop to the ground.
- Cover your head and neck with your arms to protect yourself from falling debris.

- If you are in danger from falling objects, and you can move safely, crawl for additional cover under a sturdy desk or table.
- If there is low furniture or an interior wall or corner nearby, and the path is clear, these may also provide some additional cover.
- Stay away from glass, windows, outside doors and walls, and anything that could fall, such as light fixtures or furniture. Hold on to any sturdy covering so you can move with it until the shaking stops. Stay where you are until the shaking stops

If getting safely to the floor to take cover won't be possible:

- Identify an inside corner of the room away from windows and objects that could fall on you. The Earthquake Country Alliance advises getting as low as possible to the floor. People who use wheelchairs or other mobility devices should lock their wheels and remain seated until the shaking stops. Protect your head and neck with your arms, a pillow, a book, or whatever is available.

If you are outside when you feel the shaking:

- If you are outdoors when the shaking starts, move away from buildings, streetlights, and utility wires. Once in the open, "Drop, Cover, and Hold On." Stay there until the shaking stops. This might not be possible in a city, so you may need to duck inside a building to avoid falling debris.

If you are in a moving vehicle when you feel the shaking:

- If you are in a moving vehicle, stop as quickly and safely as possible and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, and utility wires. Proceed cautiously once the earthquake has stopped. Avoid roads, bridges, or ramps that the earthquake may have damaged.

After an earthquake:

- When the shaking stops, look around. If there is a clear path to safety, leave the building and go to an open space away from damaged areas.
- If you are trapped, do not move about or kick up dust.
- If you have a cell phone with you, use it to call or text for help.
- Tap on a pipe or wall or use a whistle, if you have one, so that rescuers can locate you.
- Once safe, monitor local news reports via battery operated radio, TV, social media, and cell phone text alerts for emergency information and instructions.
- Be prepared to "Drop, Cover, and Hold on" in the likely event of aftershocks.

Explosion

Before an Explosion

The following are things you can do to protect yourself in the event of an explosion:

- Build an Emergency Supply Kit
- Learn what to do in case of bomb threats or receiving suspicious packages and letters
- Ensure your friends and co-workers have up-to-date information about any medical needs you may have and how to contact designated beneficiaries or emergency contacts.

During an Explosion

- Get under a sturdy table or desk if things are falling around you. When they stop falling, leave quickly, watching for obviously weakened floors and stairways.
- Stay low if there is smoke. Do not stop to retrieve personal possessions or make phone calls.
- Check for fire and other hazards.
- Once you are out, do not stand in front of windows, glass doors or other potentially hazardous areas.
- If you are trapped in debris, use a flashlight, whistle or tap on pipes to signal your location to rescuers.
- Shout only as a last resort to avoid inhaling dangerous dust.
- Cover your nose and mouth with anything you have on hand.

After an Explosion

- There may be significant numbers of casualties or damage to buildings and infrastructure.
- Heavy law enforcement involvement at local, state and federal levels.
- Health and mental health resources in the affected communities can be strained to their limits, maybe even overwhelmed.
- Extensive media coverage, strong public fear and international implications and consequences.

Armed Assailants and Shooting Incidents

If the situation should arise that an armed assailant has entered the campus area and threatened violence and/or started shooting, the Florida College of Integrative Medicine may enter into a lockdown mode. Please note, that these situations are highly unpredictable, and that the following guidelines are based on past experiences. Altering responses may be necessary depending on the situation.

During and active shooter incident RUN and escape, if possible:

- Get away from the shooter or shooters is the top priority.
- Leave your belongings behind and get away.
- Help others escape, if possible, but evacuate regardless of whether others agree to follow.
- Warn and prevent individuals from entering an area where the active shooter may be.
- Call the Police when you are safe, and describe shooter, location, and weapons
- HIDE, if escape is not possible:
- Get out of the shooter's view and stay very quiet.
- Silence all electronic devices and make sure they won't vibrate.
- Lock and block doors, close blinds, and turn off lights
- .Don't hide in groups-spread out along walls or hide separately to make it more difficult for the shooter.
- Try to communicate with police silently through text message or social media-so they know geo-tagged location, or by putting a sign in a window.
- Stay in place until law enforcement gives you the all clear.
- Your hiding place should be out of the shooter's view and provide protection if shots are fired in your direction.
- FIGHT as an absolute last resort:
- Commit to your actions and act as aggressively as possible against him/her.
- Recruit others to ambush the shooter with makeshift weapons like chairs, fire extinguishers, scissors, books, etc. to distract and disarm the shooter.

- Be prepared to cause severe or lethal injury to the shooter.
- Throw items and improvise weapons

AFTER an active shooter incident:

- Keep hands visible and empty
- Know that law enforcement's first task is to end the incident, and they may have to pass injured along the way.
- Follow law enforcement instructions and evacuate in the direction they come from.
- Officers may be armed with rifles, shotguns, and/or handguns and may use pepper spray or tear gas to control the situation.
- Officers will shout commands and may push individuals to the ground for their safety
- Take care of yourself first, and then you may be able to help the wounded before first responders arrive.
- If the injured are in immediate danger, help get them to safety.
- While you wait for first responder to arrive, provide first aid-apply direct pressure to wounded and use tourniquets if you have been trained to do so.
- Turn wounded people onto their sides if they are unconscious and keep them warm.

Lockdown Procedures

If you are inside a building and you hear gunfire or receive an emergency message signifying a lockdown, please follow these steps:

- Go to the nearest room, office, or closet
- Close and lock the door
- If possible, cover the door or windows
- Place whatever you can in front of the door to prevent anyone from entering
- Place books in the front and back of your shirt to protect against gunfire
- Stay quiet and stay out of view
- DO NOT answer the door

- If you hear gunfire or have pertinent information to the situation, notify the Police. Do this ONLY if it is reasonably safe to do so

Give the communications officer the following information

- Your name
- Location of the incident (as specific as possible)
- Number of known shooters
- Identification of the shooter
- Type of weapon (handgun, rifle, etc.)
- Your current location
- Location of known victims

Stay barricaded inside the room, closet, etc. until you're escorted out by an emergency official or given an "all clear" notification message.

If you are outside of a building, run off campus and seek shelter.

Police Response

Police are trained to respond to an active shooting incident by entering the building as soon as possible and proceeding to the area of the shooter. Early on in the incident medical treatment may be impossible to deliver to victims, because their main goal is stopping the shooter. Try to remain as calm as possible so as not to interfere with police operations. Once the area has been secured, rescue teams will arrive to provide assistance to those injured.

Criminal or Disruptive Behavior

The Florida College of Integrative Medicine is only as safe as the College Community allows it to be. Everyone is asked to assist in making the campus safe by being alert to suspicious situations and promptly reporting them.

What should I do if I observe or am a victim of a criminal act or violent behavior, or if I observe suspicious activity or person(s)?

If you observe a criminal act or are a victim, immediately notify FCIM Administration or the Police.

What information do I need to have readily available when reporting?

- Nature of the incident
- Location of the incident
- Description of the person or persons involved
- Description of property involved

What do I need to do after reporting the suspicious activity, criminal act or violent behavior?

- If possible, stay on the phone as long as possible with the communications officer and keep a visual on the suspect
- When the officers arrive, assist them by supplying them with all additional information

Disruptive behavior is any behavior that interferes with students, faculty, or staff and their access to an appropriate and/or safe educational or work environment. Some examples are behavior that draws inappropriate attention to oneself, verbal outbursts, words or actions that may cause others to fear for their safety.

- NOTIFY FCIM Administration if there is a threat to the safety of anyone
- Actively listen
- Allow the person to vent and talk out the problem
- Explain what type of behavior is acceptable
- Trust your instincts
- Focus only on what you can control
- Suggest and assist with finding resources to help resolve the problem

Suspicious Packages and Letters

Characteristics of Suspicious packages

Some common features of threat letters/packages include the following, but the presence of one or more of these elements does not always mean that the package is suspicious. In the final analysis, this evaluation depends upon the judgment of the individual screening the mail.

Potential Elements of Suspicion:

- Fictitious, unfamiliar or no return address
- Handwritten or poorly typed address
- Address to a title only or an incorrect title
- Mailed from a foreign country
- Excessive postage
- Excessive string or tape on package
- Misspelling of common words
- Restrictive markings such as “Confidential”, “Personal”, etc.
- Excessive weight and/or feel of a powdery or foreign substance
- Discoloration or stains

Do Not Open or Handle

Suspicious letters and packages should not be opened and should not be handled any more than is absolutely necessary. If there is nothing leaking from the suspicious item leave it alone and CALL THE POLICE. Keep others away from the area.

Letter or Package Claiming Contamination

If you open a letter/package with information that claims to have contaminated you, but there is no substance seen or felt in the envelope or on the letter, the chances are that you have not been contaminated. CALL THE POLICE and tell them exactly what has happened. They will dispatch the appropriate personnel to your location to follow-up on your possible exposure and to document what has taken place. Secure the area until the Police arrives. Do not handle the suspicious item anymore and do not let anyone else handle the item.

Letter or Package with a Foreign Substance

If you open a letter/package that claims to have contaminated you or there is some sort of foreign substance in the envelope or package, place the letter back into the envelope/package and close it back up. The person that opened the envelope/package and anyone who came in contact with the envelope/package or its contents after it was opened should immediately leave the room and wash their hands with soap and water. Remove any clothing that has the substance on it and place the contaminated clothing in a plastic trash bag. Then wash your hands with soap and water. CALL THE POLICE to report the letter and tell the dispatcher you have opened the envelope/package, there is a substance inside, and what you have done up to that point.

The Risk will be Evaluated and Further Measures Taken If Necessary

The Police and the local Fire Department can evaluate the risk to those in the room at the time of potential exposure as well as any impact on the remainder of the building. Based upon that risk assessment, further emergency measures may be implemented as necessary. If the risk is found to be minimal, other areas of the facility will not be disrupted and any necessary actions to return the area involved to normal activity will begin as soon as possible.

Psychological Crisis/Substance Abuse

What is psychological crisis?

A psychological crisis exists when an individual is threatening harm to themselves or others, or is out of touch with reality

The crisis may be manifested as:

Paranoia Hallucination => Uncontrollable Behavior => Complete Withdrawal

STUDENTS experiencing a severe psychological crisis should go to the nearest hospital emergency room or contact FCIM Administration, which will refer individual and group counseling services. Counseling services are professionally trained individuals seeks to assist students with social, emotional, and academic concerns in a sensitive, caring, and confidential manner. College has a directory of numbers to third party Counseling Services. Some may be covered by insurance.

FACULTY or STAFF experiencing a psychological crisis should go to the nearest hospital emergency room or call their family physician.

Should you come in contact with someone experiencing a psychological crisis:

- do not attempt to handle the potentially dangerous situation alone
- call the Police
- the safety of the person in crisis and those around him should be of first concern. FCIM Administration will work closely with counseling professionals when necessary

ALL SUICIDE ATTEMPTS AND THREATS WILL BE REPORTED TO THE FCIM ADMINISTRATION IMMEDIATELY

CONTACT NUMBERS FOR EMERGENCIES AND SERVICES

EMS, AMBULANCE, FIRE.....911

National Suicide Hotline 800-273-8255

Definitions of (for) Clery Reportable Crimes

Murder and non-negligent manslaughter: the willful (non-negligent) killing of one human being by another.

Manslaughter by Negligence: the killing of another person through gross negligence.

Rape: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

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

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

Statutory rape: Non-forcible sexual intercourse with a person who is under the statutory age of consent.

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

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

Burglary: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes, this definition includes: unlawful entry with intent to commit a larceny or a felony, breaking and entering with intent to commit a larceny, housebreaking, safecracking, and all attempts to commit any of the aforementioned acts.

Motor vehicle theft: The theft or attempted theft of a motor vehicle. (Motor vehicle theft is classified as any case where an automobile is taken by a person not having lawful access, even if the vehicle is later abandoned, including joy riding.)

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

Weapon law violations: the violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: the manufacture, sale, or possession of deadly weapons; the carrying of deadly weapons, concealed or openly; the furnishing of deadly weapons to minors; aliens possessing deadly weapons; and all attempts to commit any of the aforementioned acts.

Liquor law violations: the violation of laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned activities. (Drunkenness and driving under the influence are not included in this definition.)

Drug abuse violations: violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana, synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

Hate Crime: A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim based on one or more of the following grounds:

- Disability: A preformed negative opinion or attitude toward a group or persons based on

their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

- Ethnicity: A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.
- Gender: A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.
- Gender Identity: A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non-conforming individuals.
- National Origin: A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.
- Race: A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asians, blacks or African Americans, whites.
- Religion: A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, atheists.
- Sexual Orientation: A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation

Larceny-Theft: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. (Larceny and theft mean the same thing in the UCR.) Constructive Possession is the condition in which a person does not have physical custody or possession, but is in a position to exercise dominion or control over a thing.

Simple Assault: An unlawful physical attack by one person upon another where neither the offender displays a weapon, or the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Destruction/Damage/Vandalism of Property: To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person

having custody or control of it.

Campus Crime Statistics

The FCIM Administration maintains a close relationship with the local sheriff’s offices and police departments to ensure that it is notified of any crime report that is made directly to them.

The FCIM Administration will disclose any crime report made directly to any local law enforcement agency by a member of the campus community.

Beginning with the 2015 Annual Security Report, institutions are required to provide the number of Clery Crimes with a disposition of “Unfounded”.

A crime is considered to be “Unfounded” when it is investigated by law enforcement authorities and found to be false or baseless.

The College is required to annually report to students and staff all incidents of criminal activity that occur on the campus, buildings, parking lot, and grounds.

Criminal Offenses	Year	On-campus	Non-campus Building or Property	Public Property	Unfounded
Murder/ Non-negligent Manslaughter	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Manslaughter by Negligence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Forcible Sex Offenses: Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Forcible Sex Offenses: Fondling	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Non-forcible Sex Offenses: Incest	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Non-forcible Sex Offenses: Statutory Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Robbery	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Aggravated Assault	2022	0	0	0	0
	2021	0	0	0	0

	2020	0	0	0	0
Burglary	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Motor Vehicle Theft	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Arson	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Domestic Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Dating Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Stalking	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

Arrests and judicial referrals: Florida College of Integrative Medicine

	Year	On-campus	Non-campus Building or Property	Public Property	Unfounded
Arrests					
Liquor Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Drug Abuse Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Illegal Weapon Possession	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Disciplinary Referrals					
Liquor Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Drug Abuse Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Illegal Weapons Possession	2022	0	0	0	0
	2021	0	0	0	0

	2020	0	0	0	0
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Clery Bias Crime Statistics

There are no statistics to report for the years 2022, 2021, and 2020 for the Florida College of Integrative Medicine that fall under reportable Clery Bias Crime offenses: Murder/Non-negligent Manslaughter, Manslaughter by Negligence, Forcible Sex Offenses, Non-forcible Sex Offenses, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Any other Crime Involving Bodily Injury, Simple Assault, Intimidation, Larceny-Theft, and Destruction/Damage/Vandalism to Property.

Bias Crimes are those crimes in which the victim is intentionally selected because of the actual or perceived race, gender, religion, national origin, sexual orientation, gender identity, ethnicity, or disability of the victim and are reported to FCIM Administration, authorities or local police agencies.

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APPENDIX A – CAMPUS SECURITY REPORTING FORM

**Florida College of Integrative Medicine
Campus Security Reporting Form**

Date of report: _____

Date that incident occurred (mm/dd/yyyy): _____

Reporting Person Contact Information

Reported By: The Victim <input type="checkbox"/> A Third Party <input type="checkbox"/>	
First Name:	Last Name:
Phone Number:	E-mail Address:
If a third party reported the crime to you, please enter the relationship of the third party to the victim: _____	

Agency Notified

If, to your knowledge, a law enforcement agency was notified, please enter the name of that agency.

Agency: _____

Does the victim want the incident reported to law enforcement? Yes No

Incident Information

Location of incident (<i>building name, street address, office number</i>): _____
Time of incident (<i>if known</i>): _____

Incident description (*Please provide specific, detailed information; can attach additional document if necessary.*)

Incident category:	<i>(Please see attached for definitions of offenses.)</i>		
Homicide	<input type="checkbox"/>	Burglary	<input type="checkbox"/>
Aggravated Assault	<input type="checkbox"/>	Robbery	<input type="checkbox"/>
Sex Offense (Forcible)	<input type="checkbox"/>	Motor Vehicle Theft	<input type="checkbox"/>
Sex Offense (Non-Forcible)	<input type="checkbox"/>	Arson	<input type="checkbox"/>
Dating Violence	<input type="checkbox"/>	Domestic Violence	<input type="checkbox"/>
Stalking	<input type="checkbox"/>	Hate Crime <i>Please see below for additional information.</i>	<input type="checkbox"/>
Arrest for Liquor Law Violation	<input type="checkbox"/>	Referral for Liquor Law Violation	<input type="checkbox"/>
Arrest for Drug Law Violation	<input type="checkbox"/>	Referral for Drug Law Violation	<input type="checkbox"/>
Arrest for Weapons Law Violation	<input type="checkbox"/>	Referral for Weapons Law Violation	<input type="checkbox"/>
Other Crime Category	<i>If the crime was not listed above, please enter the additional crime category: _____</i>		

I am not sure how to classify this incident.

Please provide as much information as possible so that campus personnel can make this determination.

Is there any evidence that this crime was motivated by bias? Yes No

If yes, please choose any/all categories of prejudice that apply.

- Race Ethnicity Disability Gender Identity
 Gender Religion National Origin Sexual Orientation

If you answered “yes” to the Motivated by Bias question, please provide a brief summary of the evidence supporting a bias motivation:

Location

What best describes the location of the crime? *(If the crime occurred in multiple places, check all that apply. Please see the attached for further explanation as to the geography.)*

- On campus, in the classroom
- On campus, in the clinic
- Public property immediately next to campus
- Non-campus
- Unknown location, other
- I do not know which category this location would fall under.

Please review the information within the form. When complete, submit the form to:

Florida College of Integrative Medicine of Campus Security

ATTN: Jenjen Han

Director of Campus Safety

7100 Lake Ellenor Dr. Orlando FL 32809

Email: safety@fcim.edu

Phone: 407-888-8689

Crime Definitions

Homicide	<ul style="list-style-type: none">● Murder/non-negligent manslaughter: the willful (non-negligent) killing of one human being by another● Negligent Manslaughter: the killing of another person through gross negligence
Sex Offenses - Forcible	<ul style="list-style-type: none">● Rape: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.● Forcible sodomy: oral or anal sexual intercourse with another person, forcibly and/or against that person's will; or not forcibly and/or against that person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity● Sexual assault with an object: use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity● Forcible fondling: touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will or, not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her mental incapacity
Sex Offenses – Non-Forcible	<ul style="list-style-type: none">● Incest: non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law

	<ul style="list-style-type: none"> • Statutory Rape: non-forcible sexual intercourse with a person who is under the age of consent
Robbery	Taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear
Aggravated Assault	Unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury
Burglary	Unlawful entry of a structure to commit a felony or a theft
Motor Vehicle Theft	The theft or attempted theft of a motor vehicle
Arson	Willful or malicious burning or attempt to burn with or without intent to defraud a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
Dating Violence	<p>Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:</p> <ul style="list-style-type: none"> • the length of the relationship • the type of the relationship • the frequency of interaction between the persons involved in the relationship
Domestic Violence	Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction...or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction
Stalking	Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or suffer substantial emotional distress
Liquor Law Violation	The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages
Drug Law Violation	The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use
Illegal Weapons Possession	The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons

Geography Definitions

On campus:

- any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including the classroom and clinic;

Non-campus building or property:

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

Public property:

- all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus

APPENDIX B – SUBSTANCE ABUSE POLICY

All full-time and part-time students and personnel of the College are subject to federal, state and local laws as well as rules set forth by the College with regard to controlled substances. The breach or violation of any of these laws and rules may result in suspension or termination.

The College maintains a drug-free workplace in compliance with the Drug-Free Workplace Act of 1988. All employees are hereby notified that the illegal possession, use, sale, delivery and/or manufacture of controlled substances are strictly prohibited in the workplace, on College grounds and at College activities. Violations may subject the employee to dismissal from employment and to prosecution and, if convicted, fines or imprisonment.

Except in the case of authorized functions, the possession or consumption of alcoholic beverages while on College property is not tolerated. Because drug and alcohol abuse is widespread in today's society, the College provides the following information to all students.

Drugs and Alcohol Prohibited

The unlawful possession, use or distribution of illegal drugs and alcoholic beverages on College property or in connection with any College activity is strictly prohibited. This prohibition applies to all students and employees. Violation of this prohibition may result in dismissal from the College.

Legal Sanctions Against Unlawful Possession or Distribution of Controlled Substances

Severe penalties and sanctions exist in state and federal law against illegal trafficking and possession of controlled substances.

- Under state law, penalties vary based on the nature of the illegal substances. First time offenders may receive up to 20 years while repeat offenders can receive life imprisonment. A schedule of fines up to \$20 million is in place.
- The Federal Controlled Substances Act provides penalties for unlawful manufacturing, distribution and dispensing of controlled substances. Penalties vary depending on the substance involved, quantity involved, and the number of offenses.
- For example, under federal law trafficking or possession of less than 50kg of marijuana can result in a sentence of up to five years and a fine up to \$250,000 for an individual. If more than 1,000kg is involved, the sentence is not less than 10 years and the fine can go up to \$4 million.
- In the case of 100-999 gm of heroin or 500-4,999 gm of cocaine, sentences are not less than 5 years or more than 40 years.

Health Risks

Various health risks are associated with the use of illegal drugs and abuse of alcohol.

- **Alcohol** use can lead to false feelings of confidence and control. Use over time can lead to dependency and heavy use can lead to death. Liver, brain, heart and stomach damage is incurred even without apparent symptoms.
- **Marijuana** use may impair or reduce short-term memory and comprehension, altered sense of time, and reduce coordination and energy level. Users often have a lowered immune system and an increased risk of lung cancer.
- **Cocaine** users often have a stuffy, runny nose and may have a perforated nasal septum. The immediate effects of cocaine use include dilated pupils and elevated blood pressure, heart rate, respiratory rate, and body temperature, followed by depression. Crack, or freebase rock cocaine, is extremely addictive and can cause delirium, hallucinations, blurred vision, severe chest pain, muscle spasms, convulsions, and even death.
- **Amphetamines** can cause a rapid or irregular heartbeat, tremors, loss of coordination, collapse, and death. Heavy users are prone to irrational acts.
- **Heroin** is an opiate drug that causes the body to have diminished pain reactions. The use of heroin can result in coma or death due to a reduction of heart rate.

Assistance for Students

Students who need assistance with abuse of drugs or alcohol can self-refer themselves to the following organizations:

- National Institute on Drug Abuse Hotline (800) 662-HELP
- Alcohol & Drug Abuse Helpline (800) 234-0420
- Alcoholics Anonymous (407) 521-0012

APPENDIX C – FCIM POLICY AGAINST BULLYING & HARASSMENT

a. Statement prohibiting bullying and harassment:

It is the policy of the Florida College of Integrative Medicine (“FCIM” or “College”) that all of its students and school employees have an educational setting that is safe, secure, and free from harassment and bullying of any kind. FCIM will not tolerate bullying and harassment of any type. Conduct that constitutes bullying and harassment, as defined herein, is prohibited.

b. Definition of bullying and a definition of harassment:

Bullying means systematically and chronically inflicting physical hurt or psychological distress on one or more students or employees. It is further defined as unwanted and repeated written, verbal, or physical behavior, including any threatening, insulting, or dehumanizing gesture, by a student or adult, that is severe or pervasive enough to create an intimidating, hostile, or offensive educational environment; cause discomfort or humiliation; or unreasonably interfere with the individual’s school performance or participation; and may involve but is not limited to:

1. Teasing
2. Social Exclusion
3. Threat
4. Intimidation
5. Stalking
6. Physical violence
7. Theft
8. Sexual, religious, or racial harassment
9. Public humiliation
10. Destruction of property

Harassment means any threatening, insulting, or dehumanizing gesture, use of data, electronic equipment, or computer software, or written, verbal or physical conduct directed against a student or school employee that:

1. Places a student or school employee in reasonable fear of harm to his or her person or damage to his or her property;
2. Has the effect of substantially interfering with a student’s educational performance, opportunities, or benefits; or
3. Has the effect of substantially disrupting the orderly operation and/or reputation of a school

Bullying and harassment also encompasses:

1. Retaliation against a student or school employee by another student or school employee for asserting or alleging an act of bullying or harassment. Reporting an act of bullying or harassment that is not made in good faith is considered retaliation.
2. Perpetuation of conduct listed in the definition of bullying or harassment by an

individual or group with intent to demean, dehumanize, embarrass, or cause emotional or physical harm to a student or school employee by:

- a. Incitement or coercion;
- b. Accessing or knowingly and willingly causing or providing access to data or computer software through a computer, computer system, or computer network within the scope of the school; or
- c. Acting in a manner that has an effect substantially similar to the effect of bullying or harassment

Cyberstalking as defined in s. 784.048(1)(d), F.S., means to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress to that person and serving no legitimate purpose.

c. Description of the type of behavior expected from each student and school employee of FCIM:

The Florida College of Integrative Medicine expects students to conduct themselves as appropriate for their levels of development, maturity, and demonstrated capabilities with a proper regard for the rights and welfare of other students and school staff, the educational purpose underlying all school activities, and the care of school facilities and equipment.

FCIM believes that standards for student behavior must be set cooperatively through interaction among the students, staff, and community members producing an atmosphere that encourages students to grow in self-discipline. The development of this atmosphere requires respect for self and others, as well as for school and community property on the part of students, staff, and community members. Since students learn by example, school administrators, faculty, staff, and volunteers will demonstrate appropriate behavior, treat others with civility and respect, and refuse to tolerate bullying or harassment.

Bullying or harassment of any student or school employee is prohibited:

- a) During any education program or activity conducted by FCIM or otherwise on FCIM grounds;
- b) During any school-related or school-sponsored program or activity;
- c) Through the use of data or computer software that is accessed through a computer, computer system, or computer network of FCIM

d. Consequences for a student or employee of FCIM who commits an act of bullying or harassment:

Concluding whether a particular action or incident constitutes a violation of this policy requires a determination based on all of the facts and surrounding circumstances. The physical location or time of access of a computer-related incident cannot be raised as a defense in any disciplinary action. Consequences and appropriate remedial action for students who commit acts of bullying or harassment may range from positive behavioral

interventions up to and including suspension or expulsion, as outlined in the Code of Student Conduct. Consequences and appropriate remedial action for a school employee found to have committed an act of bullying or harassment may be disciplined in accordance with school policies, procedures, and agreements. Additionally, egregious acts of harassment by certified educators may result in a sanction against an educator's state issued certificate. (See State Board of Education Rule 6B-1.006, FAC., *The Principles of Professional Conduct of the Education Profession in Florida*.) Consequences and appropriate remedial action for a visitor or volunteer, found to have committed an act of bullying or harassment shall be determined by the school administrator after consideration of the nature and circumstances of the act, including reports to appropriate law enforcement officials.

e. Consequences for a student or employee of FCIM who is found to have wrongfully and intentionally accused another of an act of bullying or harassment:

Consequences and appropriate remedial action for a student found to have wrongfully and intentionally accused another as a means of bullying or harassment range from positive behavioral interventions up to and including suspension or expulsion, as outlined in the Code of Student Conduct. Consequences and appropriate remedial action for a school employee found to have wrongfully and intentionally accused another as a means of bullying or harassment may be disciplined in accordance with school policies, procedures, and agreements. Consequences and appropriate remedial action for a visitor or volunteer, found to have wrongfully and intentionally accused another as a means of bullying or harassment shall be determined by the school administrator after consideration of the nature and circumstances of the act, including reports to appropriate law enforcement officials.

f. Procedure for reporting an act of bullying or harassment, including provisions that permit a person to anonymously report such an act.

The Academic Dean is responsible for receiving complaints alleging violations of this policy. All school employees are required to report alleged violations of this policy to the Academic Dean. All other members of the school community, including students, volunteers, and visitors are encouraged to report any act that may be a violation of this policy anonymously or in-person to the principal or principal's designee.

The Academic Dean shall establish and prominently publicize to students, staff, volunteers, and parents/legal guardians, how a report of bullying or harassment may be filed either in-person or anonymously and how this report will be acted upon. The victim of bullying or harassment, anyone who witnessed the bullying or harassment, and anyone who has credible information that an act of bullying or harassment has taken place may file a report of bullying or harassment. A school employee, school volunteer, student, spouse, partner, parent/legal guardian or other persons who promptly reports in good faith an act of bullying or harassment to the appropriate school official and who makes this report in compliance with the procedures set forth in the school policy is immune from a cause of action for damages arising out of the reporting itself or any failure to remedy the reported incident. Submission of a good faith complaint or report of bullying or harassment will not affect the complainant or reporter's future employment, grades, learning or working environment, or work

assignments.

Any written or oral reporting of an act of bullying or harassment shall be considered an official means of reporting such act(s). Reports may be made anonymously, but formal disciplinary action may not be based solely on the basis of an anonymous report.

g. Procedure for the prompt investigation of a report of bullying or harassment and the persons responsible for the investigation. The investigation of a reported act of bullying or harassment is deemed to be a school-related activity and begins with a report of such an act.

At FCIM, the Procedures for Investigating Bullying and/or Harassment include:

- The Academic Dean or his/her designee assigns a person who is trained in investigative procedures to initiate the investigation. Such investigator may not be the accused perpetrator (harasser or bully) or the victim.
- Documented interviews of the victim, alleged perpetrator, and witnesses are conducted privately, separately, and are confidential. Each individual (victim, alleged perpetrator, and witnesses) will be interviewed separately and at no time will the alleged perpetrator and victim be interviewed together.
- The investigator shall collect and evaluate the facts including, but not limited to:
 - o Description of incident(s) including nature of the behavior; context in which the alleged incident(s) occurred, etc.;
 - o How often the conduct occurred;
 - o Whether there were past incidents or past continuing patterns of behavior;
 - o The relationship between the parties involved;
 - o The characteristics of parties involved (i.e., grade, age, etc.);
 - o The identity and number of individuals who participated in bullying or harassing behavior;
 - o Where the alleged incident(s) occurred;
 - o Whether the conduct adversely affected the student's education or educational environment;
 - o Whether the alleged victim felt or perceived an imbalance of power as a result of the reported incident; and
 - o The date, time, and method in which the spouse/partner, parents/legal guardians of all parties involved were contacted.
- Whether a particular action or incident constitutes a violation of this policy requires a determination based on all the facts and surrounding circumstances and includes:
 - o Recommended remedial steps necessary to stop the bullying and/or harassing behavior; and
 - o A written final report to the Academic Dean.
- The maximum of 10 school days shall be the limit for the initial filing of incidents and completion of the investigative procedural steps. The highest level of confidentiality possible will be upheld regarding the submission of a complaint or a report of bullying and/or harassment, and the investigative procedures that follow.

h. Process to investigate whether a reported act of bullying or harassment is within the

Administration's scope of legal authority to handle and, if not, a process for referral of such an act to the appropriate jurisdiction:

The Academic Dean or his/her designee will assign a person who is trained in investigative procedures to initiate an investigation of whether an act of bullying or harassment is within the scope of the school.

The investigator will provide a report on results of investigation with recommendations for the Administration to make a determination if an act of bullying or harassment falls within the scope of the school.

- If it is within scope of school, move to Procedures for Investigating Bullying and/or Harassment (as outlined in section (g) above).
- If it is outside scope of school, and determined a criminal act, refer to appropriate law enforcement.
- If it is outside scope of school, and determined not a criminal act, inform parents/legal guardians of all students involved.

i. Procedure for providing immediate notification to the parents/legal guardians of a minor victim of bullying or harassment and the parents/legal guardians of the perpetrator of an act of bullying or harassment as well as, notification to all local agencies where criminal charges may be pursued against the perpetrator:

The Academic Dean or his /her designee, shall promptly **report via telephone, personal conference, and/or in writing, the occurrence of any incident of bullying or harassment as defined by this policy to the parent or legal guardian of all minor students involved** on the same day an investigation of the incident(s) has been initiated. Notification must be consistent with the student privacy rights under the applicable provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA).

Once the investigation has been completed and it has been determined that criminal charges may be pursued against the perpetrator, all appropriate local law enforcement agencies will be notified by telephone and/or in writing.

j. Procedure for providing instruction to students, parents/legal guardians, teachers, school administrators, counseling staff, and school volunteers on identifying, preventing, and responding to bullying or harassment:

FCIM ensures that the school sustains a healthy, positive, and safe learning environment for all students. It is important to change the social climate of the school and the social norms with regards to bullying. This requires the efforts of everyone in the school environment – instructors, clinical supervisors, administrators, other non-teaching staff (such as custodians, and school librarians), spouses/partners, parents/legal guardians, and students.

Students, instructors, clinical supervisors, school administrators, advising staff, and school volunteers shall be given instruction at a minimum on an annual basis on the FCIM's Policy and Regulations against bullying and harassment. The instruction shall include

evidence-based methods of preventing bullying and harassment, as well as how to effectively identify and respond to bullying in schools.

k. Procedure for regularly reporting to a victim's spouse/partner or parents/legal guardians the actions taken to protect the victim:

The Academic Dean, or his/her designee, shall by telephone and/or in writing report the occurrence of any incident of bullying as defined by this policy to the parent or legal guardian of all minor students involved on the same day an investigation of the incident has been initiated. According to the level of infraction, spouse/partner, parents/legal guardians will be notified by telephone and/or writing of actions being taken to protect the student; the frequency of notification will depend on the seriousness of the bullying or harassment incident. Notification must be consistent with the student privacy rights under the applicable provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA).

l. Procedure for publicizing the policy which must include its publication in the code of student conduct required under s. 1006.07(2), F.S., and in all employee handbooks:

FCIM shall provide notice to students and staff of this policy through appropriate references in the code of student conduct found in the *FCIM Student Handbook* and employee handbooks, and/or through other reasonable means.