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**Rocky Vista University College of Osteopathic Medicine
Annual Security Report and
Annual Fire Safety Report**



**Published September 26, 2018
Report for the 2017 Academic year**

**8401 S. Chambers Rd., Parker, CO 80134
255 E. Center St., Ivins, UT 84738**

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Introduction

Rocky Vista University (RVU) is providing the following information to all of its current students and employees and online as part of the University's commitment to safety and security, pursuant to the requirements of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA") which added "SaVE Act" provisions. VAWA amended the Clery Act requirements to require institutions to compile statistics for incidents of domestic violence, dating violence, sexual assault, and stalking and to include certain policies, procedures, and programs pertaining to these incidents in their annual security reports.

This report is intended to provide the students, faculty and staff of RVU with information and statistics on crime and crime prevention and fire incidents and fire safety on campus. The report describes how the campus security system works and how to access this system in an emergency. It covers safety and security in student housing and academic and administrative buildings, the university's policies on alcohol and drugs, and it describes substance abuse prevention and education programs currently in place.

Working in collaboration with Campus Safety & Security, the university makes every effort to prevent crime on campus. However, RVU also recognizes the crucial role that individuals must play in protecting themselves and others from harm. The university encourages all students, faculty and staff to use the personal safety tips provided by Campus Safety & Security and to report immediately all crimes, suspicious activities or emergencies occurring on or off campus to Campus Safety & Security or to local police.

The Jeanne Clery Act and Higher Education Act

The Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act and the Higher Education Opportunity Act provide that campus communities receive an annual report containing crime statistics, fire incident statistics, and safety policies. The statistical information in this report allows members of the campus community to be informed about criminal activity occurring within and immediately surrounding the geographical boundaries of the campus and any related buildings owned or operated by the University.

Additionally, fire incident and safety systems information assists residents in emergency planning. Of equal importance are the safety policies and guidance in this report, which allows individuals to make informed decisions about their personal safety and enhance the safety of the community through their actions.

RVU students, faculty and staffs are informed of the availability of the report, which is located on the University website at www.rvu.edu. The Report is available to prospective employees and

students by viewing the same University website. A paper copy may be requested by emailing astevens@rvu.edu and a copy will be mailed.

***JEANNE CLERY DISCLOSURE OF CAMPUS SECURITY POLICY AND CAMPUS CRIME STATISTICS
ACT, AS AMENDED BY THE VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013***

Rocky Vista University (RVU) does not discriminate on the basis of sex in its educational programs and sexual harassment and sexual violence are types of sex discrimination. Other acts can also be forms of sex-based discrimination and are also prohibited whether sexually based or not and include domestic violence, and stalking. As a result, RVU 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 and stalking, whether the incident occurs on or off campus and when it is reported to a University official. In this context, RVU prohibits the offenses of domestic violence, sexual assault and stalking and reaffirms its commitment to maintain a campus environment emphasizing the dignity and worth of all members of the university community.

For a complete copy of RVU's policy governing sexual misconduct, visit www.rvu.edu.

Mission & Guiding Principles

Rocky Vista University provides an exceptional education that inspires professional success and lifelong personal and intellectual growth. In support of our mission and recognizing the importance of preserving our unique student-centered culture we will be guided by the following principles:

- Undertake continuous improvement and planning for a sustainable future
- Enrich our academic programs with experiential and work-integrated learning
- Be cost-conscious in our endeavor to provide an affordable private University education and be a good steward of our resources
- Embrace diversity for a richly inclusive community
- Model ethical behavior and local, national and global citizenship
- Value our faculty and staff by investing in their quality of life and professional development
- Provide facilities, technology and other resources to meet the needs of students, faculty and staff

Campus Safety & Security

All Campus Safety and Security personnel are trained and experienced Officers. The Safety and Security Officers routinely patrol campus areas and aid the local police by making reports and being witnesses to crimes or incidents that happen on or around the campuses. All Campus Security personnel attend mandatory in-service training to keep up to date on regulations and to improve their skills, and all are trained in first aid/CPR/BLS.

Campus Safety & Security has developed highly cooperative relationships with state and local police departments to help ensure prompt and efficient action in apprehending alleged criminals and preventing crime. The Parker Police Department, Douglas County Sheriff's Office, and Santa Clara-Ivins Police Department has agreed to notify RVU Campus Safety and Security in their respective states when they investigate a crime involving a student or when a third party calls the police on campus. RVU Campus Safety & Security also actively participates in local emergency planning efforts toward disaster preparedness.

The University does not currently have any signed memorandum of understanding written agreements with local law enforcement agencies. Campus Security Officers do not carry firearms and have no state arrest powers. The University does not have any officially recognized student organizations with off campus locations.

Both of RVU's Offices of Campus Safety and Security keeps a daily crime log. The reports contain an Incident Report of any criminal incident or alleged criminal incident that occurs at the University or on public property, within or immediately adjacent to and is accessible from the campus, or that occurred within the patrol jurisdiction of the security departments and is reported to the departments. This log extends beyond Clery Act crimes. This information is available for public inspection, upon request, during normal business hours.

Information in the crime log includes the following: the nature of the crime, the date and time the crime occurred, a general location of the crime, the case number, and any known disposition of the complaint. Any portion of the log older than 60 days will be made available within two business days of a request for public inspection. The University reserves the right to maintain the privacy of both the victim and the accused in any of these situations except as may be required by law.

Duty to Report

Colorado is a "Duty to Report" State, meaning residents are required to report crimes committed by others if they have knowledge of them. Colorado Revised Statutes (CRS) 18-8-115, "Duty to Report a Crime" states, "It is the duty of every corporation or person who has reasonable grounds to believe that a crime has been committed to report promptly the suspected crime to law enforcement authorities."

Utah is a “Duty to Report child abuse or neglect” State only. When someone, including licensed medical practitioners has reason to believe that a child has been subjected to abuse or neglect, or who observes a child being subjected to conditions or circumstances which would reasonably result in abuse or neglect, that person shall immediately notify the nearest peace officer, law enforcement agency, or office of the division.

Campus Security Authority Defined

A Campus Security Authority (CSA) is defined as: (1) A campus police department or a campus security department of an institution. (2) Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department under paragraph (1) of this definition, such as an individual who is responsible for monitoring entrances into institutional property. (3) Any individual or organization specified in an institution’s statement of campus security policy as an individual or organization to which students and employees should report criminal offenses. (4) An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings. If such an official is a pastoral or professional counselor, the official is not considered a campus security authority when acting as a pastoral or professional counselor.

The following list denotes the positions at Rocky Vista University which are thought to meet the definition of a CSA. This list is intended to be comprehensive, but certain positions may not be specifically listed. If you believe your job duties meet the definition of CSA, please contact astevens@rvu.edu. (Please see page 10 for a list of positions, which are exempt from reporting).

- Law enforcement and security officers, including contract security
- Resident Deans
- Resident Fellows
- Residence Assistants and Community Assistants
- Athletic Coaches
- Title IX staff
- Office of Community Standards staff
- Study Abroad Administrators
- The Bridge and other peer counselors
- Department of Athletics Red Coat staff
- The fraternity and sorority life advising team
- Community Center Directors
- Student Activities & Leadership Staff
- Dean of Students
- Graduate Life Office staff
- Student Services Officers

CSA Responsibilities

Any CSA who becomes aware of a Clery-reportable crime must report the incident to the Rocky Vista University Public Safety & Security Department (RVUPSS). Federal law does not mandate the time frame within which Clery-reportable crimes must be reported to the RVUPSS; however, in order to ensure that the University complies with the Timely Warning provision of the Clery Act the University strongly encourages CSA's to report Clery-reportable crimes to the RVUPSS as soon as practicably possible after learning of the crime.

Under Clery, a crime is "reported" when it is brought to the attention of a campus security authority or local law enforcement personnel by a victim, witness, other third party or even the offender. It doesn't matter whether or not the individuals involved in the crime, or reporting the crime, are associated with the institution. If a campus security authority receives the crime information and believes it was provided in good faith, he or she should document it as a crime report. In "good faith" means there is a reasonable basis for believing that the information is not simply rumor or hearsay. That is, there is little or no reason to doubt the validity of the information.

What must be disclosed, therefore, are statistics from reports of alleged criminal incident. It is not necessary for the crime to have been investigated by the police or a campus security authority, nor must a finding of guilt or responsibility be made to disclose the statistic. A campus security authority is not responsible for determining authoritatively whether a crime took place—that is the function of law enforcement personnel. A campus security authority should not try to apprehend the alleged perpetrator of the crime. That too is the responsibility of law enforcement. It's also not a CSA's responsibility to try and convince a victim to contact law enforcement if the victim chooses not to do so.

The preferred way of notifying the RVUPSS is in person. Alternatively, CSA's may report Clery-reportable crimes to the RVUPSS by phone or via email and a RVUPSS officer will conduct a follow up to ensure the report is completed with accuracy. The following information must be reported to the Clery Compliance Coordinator (Andrew Stevens, 8401 S. Chambers Rd, Parker, CO or 720-874-2482):

- The details of the incident(s) - sufficient to properly classify the type of crime
- The location of the incident
- The date and time the incident occurred
- The date and time the CSA was advised of the crime

CSA's are not expected, required, nor encouraged to share information that identifies the victim or alleged perpetrator with the Clery Compliance Coordinator. CSA's do not share legally-protected, confidential information with the Clery Compliance Coordinator, without the

permission of the involved parties, unless state or federal law mandates such notification (such as mandated child abuse reporting laws).

In the event an incident involves an ongoing or imminent threat to the campus community that might require a Timely Warning or Emergency Notification to be distributed, CSA's are encouraged to call **9-1-1** immediately.

Reporting a Crime or Other Emergency

Rocky Vista University strongly encourages the prompt and accurate reporting of all criminal or suspicious activities occurring on or near campus to the Security Department, when the victim of a crime elects to, or is unable to, make such a report. A student or employee who has witnessed any suspicious or apparent criminal action should immediately contact **Campus Safety & Security at 720-875-2892 (24-hour assistance) or local police at 911 or 303-841-9800 for the Colorado Campus, and Campus Safety & Security at 435-222-1300 (24-hour assistance) or local police at 911 or 435-652-1122 for the Utah Campus.** Each employee, Faculty or staff member designated as a Campus Security Authority ("CSA") has been instructed to report all criminal or suspicious activity occurring on or near campus to Safety & Security or local police. Reports of criminal actions or other emergencies occurring on or near campus or in any building or property owned or controlled by the university or recognized student organization, should be made to a Safety & Security Officer either in person or by dialing 720-875-2892 (Colorado Campus) or 435-218-6796 (Utah Campus) from any phone. Criminal actions and other emergencies can also be reported to the local police or fire department by dialing 911 or 303-841-9800 (Colorado) or 435-652-1122 (Utah) from a phone. The **Colorado** Campus Safety & Security front desk and dispatch center are located on the first floor lobby, at the main North entrance, at 8401 S. Chambers Rd. Parker, CO 80134 Monday through Friday from 7 AM to 6 PM. Outside of those hours, Campus Safety & Security can be reached at 720-875-2892 or in room 114 on the first floor. The **Utah** Campus Safety & Security front desk and dispatch center is located on the first floor lobby, at the main entrance, at 255 E. Center St. Ivins, UT 84738 Monday through Friday from 7AM to 6 PM. Outside of those hours, Campus Safety & Security can be reached at 435-222-1300 or in room 1300 on the first floor.

Campus Safety & Security personnel will immediately evaluate each report and take appropriate actions, such as calling an emergency medical team or reporting the matter to local police. Campus Safety & Security will also respond to the scene. When an Officer arrives, a preliminary investigation will be completed, and further action will be coordinated with either the Parker Police Department or Santa Clara-Ivins Police Department, if appropriate. In all cases, an incident report will be completed. Additional investigations may be conducted as necessary. If a student is identified as a suspect, the report will be forwarded to appropriate University officials for Student Conduct Review and possible disciplinary action.

Anonymous reports can also be made using the Anonymous Help/Tip Line by dialing 303-708-8185 (Parker) or 435-222-1313 (Ivins).

RVU is not required to include crimes reported only to a pastoral or professional counselor in the crime statistics published in this report. Students who seek personal counseling on campus are advised that if they disclose information that the University counselor considers to be a current threat to others, the counselor may release the information to appropriate authorities including University administration, Campus Safety & Security, the local police, or the students' parents or guardians. Students are also advised that the University will release information when required by law.

Confidentiality Options for Reporting Parties of Sexual Violence

The University recognizes that some alleged Reporting Parties of sexual violence may wish to remain anonymous or for the information they disclose to be confidential. Throughout the complaint procedures (whether formal or informal), the confidentiality of all participants will be maintained to the fullest extent possible. However, different individuals both on and off campus have different abilities to maintain a Reporting Party's confidentiality based upon applicable law, including Title IX.

The following options are designed to make students and employees aware of the disclosure options available to them, and the University encourages students to talk to someone in one or more of these groups. The University also reminds students and employees of its prohibition against retaliation located in Section V of this Policy, and if the student or employee is concerned about retaliation from the alleged Responding Party, the University will take steps to prevent retaliation and take strong responsive actions to retaliatory conduct.

- ***Professional and Pastoral Counselors:*** These professionals, including the University's clinical psychologist, are bound by professional ethics to not release information without the patient's permission, except in circumstances where the counselor or health care provider believes that there is a serious threat of imminent physical violence to a specific person or persons, or as otherwise required or permitted by applicable law.
- ***Responsible Employees of the University:*** Responsible employees of the University are obligated to report incidents of possible sexual violence to school officials, including the Title IX Coordinator. A responsible employee is defined as University employee who has the authority to redress sexual violence, who has been given the duty of reporting incidents of sexual violence or any other misconduct to students to the Title IX coordinator or other appropriate school designee, or who a student could reasonably believe has this authority or duty. Therefore, reporting to a responsible

employee is not confidential. Examples of responsible employees include, but are not limited to: Campus Safety and Security Officers, Faculty members, Human Resources representatives, and Student Affairs personnel.

- ***Anonymous Reporting for Alleged Sexual Violence:*** Reporting Parties of alleged sexual violence are permitted to submit an anonymous Sexual Violence Request for Investigation or call the RVU Anonymous Help/Tip Line by dialing 303-708-8185 (Parker) or 435-222-1313 (Ivins). The University may act then on behalf of the Reporting Party and act as Reporting Party on behalf of the student. However, the student must understand that remaining anonymous will impede the University's ability to investigate and respond to the complaint.
- ***Filing a Request for Investigation or Reporting to a Responsible Employee with a Confidentiality Request:*** A student Reporting Party of alleged sexual violence may ask that a Request for Investigation or report to a responsible employee be handled confidentially or that an investigation not be completed. In such a situation, the University must weigh the student's request against the University's obligation to provide a safe, non-discriminatory environment for all of its students and employees. If the University honors the student's request for confidentiality, the student must understand that the University's ability to meaningfully conduct an investigation into the sexual misconduct will be impeded, including the ability to sanction the alleged Responding Party. However, in some cases the University may not be able to honor a student's request for confidentiality in order to provide a safe, non-discriminatory environment for all of its students and employees.

The Title IX Coordinator will evaluate requests for confidentiality in accordance with the following factors:

- The risk that the alleged Responding Party will commit additional acts of sexual misconduct;
- The severity of the sexual misconduct;
- Whether sexual violence or a weapon was involved;
- Whether the report reveals a pattern of perpetration at a given location or by or against a particular group;

If the University determines that it cannot maintain a student's confidentiality, it will, to the extent possible, inform the student prior to taking any action that would disclose the student's identity, and will, to the extent possible, only share information with people responsible for handling the University's investigation and response. The University may not require the student requesting confidentiality to participate in the investigation.

Regardless of whether the University honors a request for confidentiality, the University will promptly take any possible steps to protect and assist the student or prevent future sexual misconduct, such as increased monitoring or security at locations where reported sexual misconduct occurred and increased education and prevention efforts.

Security of Campus Facilities

Residence Halls/On-Campus Residence: RVU has three residence halls located on the Utah Campus. Each building (apartment complex) is a three-story tall apartment building with single units on each floor for use by the students, which are leased out by Crimson Cliffs Student Residences, which principally supports RVU students at the Utah campus. Each unit contains a “rental agreement” and additional policies and procedures outlined in the terms and conditions of the agreement and is legally binding. Access is controlled by individually issued ID badges which are also used to access the main facility. All residence hall exterior gates are access controlled and are monitored and patrolled by Campus Safety and Security Staff, 24 hours a day, 7 days a week. Each unit door lock is individually keyed.

There are no residence halls at the Colorado Campus.

Administrative and Academic Facilities: Card readers are in place at all entrances on both Campuses allowing Campus Safety & Security to secure the building and still allow students and staff access. Campus Safety & Security administers the access control system that performs the unlock and secure functions and records the student or staff information as they are accessing the facility. Video intercom phones are installed at the North and South entrances at the Colorado Campus; Closed Circuit security cameras have been installed at all building entrances and in parking lots in the effort to deter criminal activity and help ensure the safety of the students, staff, and visitors that are at either campus. The surveillance system is recorded and may not be monitored at all times. The recording may be copied and provided to law enforcement or University disciplinary board to assist in the investigation of an incident or in the event of a crime.

Timely Maintenance for Security: Any maintenance problem affecting the building, including classrooms receive a work order, prioritized for safety issues and forwarded to facilities management.

Keeping the University Community Informed

A major goal of the University is to keep students, faculty and staff informed about campus security and safety procedures and to encourage them to act responsibly to ensure their own safety and the safety of others. Incoming freshmen students are instructed on how to report a crime or emergency, on the functions of Campus Safety & Security, and on the consequences of possessing drugs, alcohol or other contraband on and off campus.

In addition, annual faculty and staff training is provided as requested. Periodic information is distributed to all community members in newsletters’ and other sources or at meetings

and other events in the form of flyers, on information monitors, or class announcements. Information will also be displayed in public places. Both the Colorado and Utah Campus Safety & Security departments make available a safety services brochure that provides information on contacting RVU Campus Safety & Security and other local emergency services, discusses crime prevention programs, and provides tips on awareness and crime prevention.

Definition of Timely Warnings

To date, the Department of Education has declined to provide a definition of "timely reports." The Department of Education has advised that "timely reporting to the campus community. . . must be decided on a case-by-case basis in light of all the facts surrounding a crime, including factors such as the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts.

Confidentiality Issues in Timely Warnings

All Clery reportable crimes are subject to the "timely warning" requirements when police believe the crimes pose an ongoing threat regardless of whether or not the victim or perpetrator is a member of the campus community. However, there are often concerns raised regarding confidentiality if the information disclosed in the "timely warning" report would personally identify an individual. Information that might personally identify students may be disclosed, if disclosure of this information is necessary to protect the health and safety of the student or other individuals. For example, see the Family Educational Rights and Privacy Act (FERPA) and the FERPA regulations: personally identifiable information may be disclosed from an education record of a student without the student's consent "to appropriate parties in connection with an emergency if knowledge of the information is necessary to protect the health or safety of a student or other individuals." The campus may disclose personally identifying information about an individual if it determines "that compelling circumstances exist which affect the health or safety of an individual." This standard also applies to the disclosure of personally identifying information about any other individuals, including campus employees and individuals not associated with the campus.

Timely Warning Procedure

In order to keep the campus community informed on an ongoing basis, the University will alert the campus community of certain crimes in a manner that is timely and will aid in the prevention of similar crimes. An alert will be issued and posted for all Clery Act crimes that are reported to Campus Security Authorities, or are reported to Campus Safety & Security by local police agencies, and are considered by the university to represent a serious or continuing threat to students and employees, that occur on the university Clery geography.

These alerts will be posted on the Campus Safety & Security website at www.rvu.edu/security at the earliest possible. Additionally, alerts are also posted on designated Safety & Security notification boards throughout campus. If necessary, notification to the larger community via written press release or telephone call, will be made.

The alert will include the following content: nature and description of the incident, location, date and time of the incident, date and time posted suspect/vehicle descriptions (if applicable) and relative crime prevention tips.

Campus Safety & Security maintains a daily crime log listing the nature, date, time and general location of each crime and the disposition of the complaint, if known, and date reported. These postings inform community members of the nature of the critical incident, the manner in which to report similar incidents, and, in addition, provide prevention tips to avoid being victimized.

The amount and type of information that the campus discloses in a "timely warning" report will vary depending on the circumstances of each case, as noted above in the Department of Education explanation of this provision. In general, whenever a report of a violent crime against a person or a major crime against property on campus is received by the campus security department that is determined by the police department to represent an ongoing threat to the safety of the campus community, the campus security department must issue a "timely warning." The "timely warning" should be sequentially numbered, beginning January 1st of each year, and should include the following details of the crime, if available:

- A succinct description of the incident
- A physical description of the suspect, including gender and race
- Composite drawing of the suspect, if available
- Apparent connection to previous incidents, if applicable
- Race of the victim, if relevant
- Sex of the victim, if relevant
- Injury sustained by the victim
- Date and time the campus crime alert was released

"Timely warnings" should be distributed as soon as possible after the time the incident is reported, subject to the availability of accurate facts concerning the incidents

Immediate Notifications

The University will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Emergency Notifications are triggered by an event that is currently occurring on or immediately threatening the campus. The following are examples of significant emergencies or dangerous situations that may occur on campus to trigger an Emergency Notification:

- Active Shooter
- Bomb Threat
- Fire
- Hazardous Materials
- Natural Disaster
- Riots
- Severe Weather Event
- Terrorism

Prior to emergency notifications, the significant emergency must be confirmed. Confirmation will come for the Security Department and the University President and or Dean, or their designee, depending on the type of emergency. To evaluate the significance of any emergency that would render an Immediate Notification, the University, in conjunction with the Security Department, may consult with local authorities (law enforcement), to include the Federal Bureau of Investigations prior to submitting a notification.

In the event that there is a confirmed significant emergency or dangerous situation involving an immediate threat to the campus community, the University will, without delay, and taking into account safety of the community, determine the content of the notification, and initiate the immediate notification system. However, if in the professional judgement of responsible authorities, the notification may compromise the efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency, the notification will be delayed. As with the above section related to “Timely Warnings”, the Security Department and the University President, and or Dean, or their designee with the specifics of the case for the purpose of drafting the content of the immediate notification. The Security Department also maintains pre-scripted messages for a variety of incidents to assist in the timely issuance of immediate notifications. All Immediate Notifications will be sent via email and SMS messaging, along with University connected-network notifications.

All Immediate Notification must be followed up with either an “All Clear”, or other instructions related to the situation and safety and security of the Campus Community.

Emergency Notification Systems: Alertus and RAVE.

The safety of students, faculty and staff is a constant priority at RVU. The ability to quickly provide notice, accurate information and instructions with minimum delay during a situation is crucial. To accomplish this the Colorado Campus employs the Alertus and RAVE Emergency Notification Systems, a multi-modal communication service that allows RVU campus leaders and Security personnel to deliver time-sensitive notifications to our students, faculty and staff during unforeseen events or emergencies. The Utah Campus utilizes the RAVE Emergency Notification System which allows security to send out text and email communications to students, faculty and staff member.

These systems complement our existing campus emergency response plans, which are continuously updated to be responsive to both man-made and natural disasters. University and campus leaders have integrated our computer systems with the Alertus and RAVE systems. These systems are only used during emergencies (and for related tests). Both the University Emergency Notification Systems are mandatory, all students and staff are automatically enrolled in both systems upon hire or matriculation by the Information Services Department. There is no opt-out option.

Missing Student Policy

Any person who believes an RVU student is missing should immediately report the situation to Campus Safety & Security or to any RVU Campus Security Authority. In the event another University office or employee other than a member of Campus Safety and Security receives a report of a missing student, that person shall immediately without delay notify RVU Campus Safety & Security of the report received.

Upon receipt of a missing student notification, Campus Safety & Security will make a determination of when to implement missing student procedures based on whether there are unusual or suspicious circumstances surrounding the student’s absence and/or whether the student has been absent from campus without explanation for more than 24 hours.

Missing Student Notification Procedures

RVU Campus Safety & Security together with other authorized RVU officials will, after the student has been missing for 24 hours or sooner if they deem advisable, initiate official notification procedures according to the Missing Student Response Procedure then in place.

RVU Campus Safety & Security shall notify local police and/or other local law enforcement and shall also contact the following in the order they deem advisable:

- The missing student's "confidential contact," if any (see Admissions for information on registering a "confidential contact")
- The parent(s) or legal guardian as well as any other designated contact person of any missing student under the age of 18
- The regular emergency contact provided to Health Services by the student. Once the student has been located, further notifications do not need to be made.

Emergency Response and Evacuation Procedures

RVU has adopted a University Emergency Response and Communications Plan as a guide for emergency management and coordination of emergency operations. This Statement of Policy describes the following procedures to facilitate notification and evacuation responses in an emergency:

- The procedures to notify the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus.
- The process that RVU will use to confirm that there is a significant emergency and to determine whether to initiate the notification systems, whom to notify, and the content of the notification.
- A list of the titles of the RVU employees responsible for carrying out the above process.
- Procedures for disseminating emergency information to the larger community.
- RVU's procedures to test the emergency response and evacuation procedures; and
- Where to obtain RVU's emergency response and evacuation procedures.

Emergency Notification Procedures

RVU will, without delay, taking into account the safety of the community, immediately notify the appropriate campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus unless the notification will, in the professional judgment of responsible authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

The campus has implemented emergency notification systems, called Alertus and RAVE that can send notices via e-mail, SMS, and desk top messages to student and employee cell numbers and any personal computers connected to the RVU network. These systems are

used in order for RVU to quickly provide notice and accurate information and instructions to the entire University community during an unforeseen event or emergency. In order for the University to communicate effectively and in a timely manner, including in emergency situations, all students are required to manage and update, their permanent and on campus/commuter addresses and telephone contact information (including cell phone numbers) so that they are current. Students can opt in by contacting the Internet Services Department and providing their cell phone number and service provider. Employees should visit the Help Desk on the RVU website to update phone numbers. To update home or cell phone numbers, employees should contact Human Resources.

Other forms of communication may be used to relay emergency messages including, but not limited to, email, voice mail, and campus hotlines.

Emergency Confirmation and Initiation of the *Emergency Notification System*

RVU will adhere to the following process to determine whether there is a significant emergency and whether to initiate the systems, and if so, who to notify and the content of the notification. Upon discovery or report of a possible emergency, the situation will be assessed by the ranking Campus Safety & Security officer to determine:

- Type of crime if situation is a criminal incident.
- The hazards involved, including whether there is an immediate threat to the health or safety of students or employees occurring on campus.
- The magnitude of the problem.
- The resources threatened.
- Whether access to a particular area must be restricted to first responders from local/area emergency service providers or evacuation of a building is required.

The ranking Campus Safety & Security Officer and the Director of Security or designee will determine if it is appropriate to activate the University Emergency Response and Communications Plan and whether to make an emergency notification, who to notify, and the content of the notification. In addition, they will also determine whether a notification will, in their professional judgment or in consultation with appropriate police, fire, or other federal, state, and local emergency services personnel, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

Titles of RVU Employees Responsible for Carrying Out the Emergency Notification Process

The following RVU employees (or their designees) have primary responsibility for determining whether there is an emergency requiring a notification and/or carrying out the notification process:

- The Director or Supervisor of Campus Safety & Security
- The University President
- Vice President or Dean of Students
- The senior Security Officer on duty
- Emergency Manager & Director of Campus Operations (Utah)*

Procedures for Disseminating Emergency Information to the Larger Community

RVU will liaise with local, state, and federal emergency services personnel and with regulatory agencies, as applicable, during an emergency.

Procedures to Test Emergency Response and Evacuation Procedures

RVU will test its emergency response and evacuation procedures on at least an annual basis, through regularly scheduled drills, exercises and appropriate follow-through activities designed for the assessment and evaluation of emergency plans and capabilities, including by publicizing its procedures in conjunction with at least one test per calendar year and documenting a description of each test as well as the date and time of the test and whether it was announced or unannounced. RVU will conduct drills to assess its emergency plans and procedures, to determine the readiness of emergency responders for resolving questions of coordination and clarifying roles and responsibilities, and to promote awareness of potential hazards. Whenever feasible, observers from outside agencies will be present throughout the drill to analyze and evaluate each component of the response and to make recommendations as needed.

Tabletop exercises will be conducted periodically with various response team members as a technique for evaluating specific aspects of the Emergency Response Plan. These exercises will be developed and coordinated by the Campus Crisis Management Team and will seek to include external community members and government emergency service providers.

Obtaining Emergency Response and Evacuation Procedures

Students and employees may access the University's Emergency Response and Communications Plan on public folders under all public folders>_emergency procedures>rvu emergency and communications plan. We urge you to familiarize yourself with the emergency and evacuation procedures for your campus.

Please see the emergency quick reference procedures which are published on page 74 of this report.

DRUGS AND ALCOHOL

Drug-Free Schools and Communities Act

It is the University's intent to provide a drug-free, healthful, safe, and secure academic environment. In compliance with the Drug-Free Schools and Communities Act, Rocky Vista University has implemented a program to prevent the use of illicit drugs and the abuse of alcohol by students and employees. The Program requires the University to distribute information annually to students and employees concerning the possession, use, or distribution of alcohol and illicit drugs at the University.

This information includes the University's standards of conduct relating to the unlawful possession, use, or distribution of illicit drugs and alcohol, health risks associated with the use of illicit drugs and alcohol abuse, resources for obtaining assistance with drug and alcohol abuse, and a summary of legal sanctions for violations of law under the States of Colorado and Utah, and federal law, as well as University disciplinary actions relating to the unlawful possession, use, or distribution of illicit drugs and alcohol.

The Drug-Free Schools and Communities Act Program is intended to supplement and not limit the provisions of the University's Drug-Free Workplace policy applicable to University employees.

The University conducts biennial reviews of its Drug-Free Schools and Communities Act Program to: (a) determine the Program's effectiveness and implement changes to the Program if changes are needed; (b) determine the number of drug and alcohol-related violations and fatalities that—(i) occur on the University's campus, or as part of any of the University's activities; and (ii) are reported to campus officials; (c) determine the number and type of sanctions that are imposed by the University as a result of drug- and alcohol-related violations and fatalities on the University's campus or as part of any of the University's activities; and (d) ensure that the sanctions are consistently enforced.

Drug and Alcohol Policies

Rocky Vista University prohibits the unlawful manufacture, distribution, dispensation, possession or use of narcotics, drugs, or other controlled substances at the workplace and in the education setting. In addition, possession or use of alcoholic beverages anywhere on University premises is prohibited, except for lawful use at events, operations, or programs sanctioned by University officials. Unlawful for these purposes means in violation of federal, state, or local statutes, regulations, or ordinances. Workplace is defined as University premises or any place where University business is conducted away from University premises. Educational setting includes both University premises and approved educational sites off campus.

University policies and relevant laws regarding the possession or use of illegal drugs, narcotics or drug paraphernalia and illegal alcohol use are strictly enforced at the University through Campus Safety & Security and/or Human Resources, together with federal, state, and local law enforcement officials when appropriate. Rocky Vista University is not, and cannot be considered, a protector or sanctuary from the existing laws of the city, state, and federal governments.

A violation of this policy by a student constitutes a violation of the Student Code of Conduct. Disciplinary sanctions which may be imposed on a student's violation of this policy include, but are not limited to: reprimand, revocation of certain privileges, campus service, conduct probation, deferred suspension, suspension, or permanent dismissal from the University.

To ensure that all incoming students are aware of the alcohol and drug laws of the states of Colorado and Utah, an outline of Colorado and Utah penalties for drug- and alcohol-related offenses are included in the Student Handbook.

All employees of the university, as a condition of employment, must also agree to abide by the terms of this policy. In addition, all employees must notify the University of any Criminal Drug Statute Conviction for a violation occurring in the workplace no later than five days after such conviction.

Substance Abuse Prevention: Given the problems associated with consumption of alcohol or drugs, Rocky Vista University offers a variety of assessment and prevention programs for students and employees.

Rehabilitation Programs: Students who have been disciplined through the University's conduct review system for substance abuse or for negative behavior resulting from substance abuse receive sanctions underscoring the consequences for repeating similar behavior.

Counseling is available through the University's Student Services. Counselors refer any students with chronic abuse problems who need additional visits to an outpatient program.

Substance Abuse Awareness: The University community takes an active role in raising awareness of substance abuse among its students, faculty and staff. Campus activities sponsor various events and students and staff are encouraged to attend these events, which are publicized through employee and student newsletters, flyers and posters.

Health Risks Associated with the Abuse of Alcohol and Use of Illicit Drugs

The U.S. Department of Justice provides information on the effects of alcohol and commonly used drugs. This information is provided below and can also be found on the U.S. Department of Justice website at <http://www.justice.gov>.

Alcohol: Alcohol consumption causes a number of marked changes in behavior. Even a low amount can significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low to moderate amounts of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate to high amounts of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high amounts cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower amounts of alcohol will produce the effects described here.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly combined with poor nutrition, can also lead to permanent damage to vital organs, such as the brain and the liver.

Females who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at a greater risk of becoming alcoholics themselves. Because alcohol affects many organs in the body, long-term heavy drinking puts people at risk for developing serious health problems, some of which are described below.

Alcohol-Related Liver Disease: More than 2 million Americans suffer from alcohol related liver disease. Some drinkers develop alcoholic hepatitis, or inflammation of the liver, as a result of long-term heavy drinking. Its symptoms include fever, jaundice (abnormal yellowing of the skin, eyeballs, and urine), and abdominal pain. Alcoholic hepatitis can cause death if drinking continues. If drinking stops, this condition often is reversible. About 10 to 20 percent of heavy drinkers develop alcoholic cirrhosis, or scarring of the liver. Alcoholic cirrhosis can cause death if drinking continues.

Heart Disease: Moderate drinking can have beneficial effects on the heart, especially among those at greatest risk for heart attacks, such as men over the age of 45 and women after menopause. But long-term heavy drinking increases the risk for high blood pressure, heart disease, and some types of stroke.

Cancer: Long-term heavy drinking increases the risk of developing certain forms of cancer, especially cancer of the esophagus, mouth, throat, and voice box. Women are at slightly increased risk of developing breast cancer if they drink two or more drinks per day. Drinking may also increase the risk for developing cancer of the colon and rectum.

Pancreatitis: The pancreas helps to regulate the body's blood sugar levels by producing insulin. The pancreas also has a role in digesting ingested food. Long-term heavy drinking can lead to pancreatitis, or inflammation of the pancreas. This condition is associated with severe abdominal pain and weight loss and can be fatal.

Drugs

Methamphetamine: Methamphetamine releases high levels of the neurotransmitter dopamine which stimulates brain cells enhancing mood and body movement. It also appears to have a neurotoxic effect damaging brain cells that contain dopamine and serotonin, another neurotransmitter. Over time, methamphetamine appears to cause reduced levels of dopamine, which can result in symptoms like those of Parkinson's disease, a severe movement disorder. Users may become addicted quickly and use it with increasing frequency and in increasing doses. The central nervous system (CNS) actions that result from taking even small amounts of methamphetamine include increased wakefulness, increased physical activity, decreased appetite, increased respiration, hyperthermia, and euphoria. Other CNS effects include irritability, insomnia, confusion, tremors, convulsions, anxiety, paranoia, and aggressiveness. Hyperthermia and convulsions can result in death.

Methamphetamine causes increased heart rate and blood pressure and can cause irreversible damage to blood vessels in the brain, producing strokes. Other effects of methamphetamine include respiratory problems, irregular heartbeat, and extreme anorexia. Its use can result in cardiovascular collapse and death.

Cocaine: Cocaine is a strong central nervous system stimulant that interferes with the reabsorption process of dopamine, a chemical messenger associated with pleasure and movement. Dopamine is released as part of the brain's reward system and is involved in the high that characterizes cocaine consumption. The physical effects of cocaine use include constricted peripheral blood vessels, dilated pupils, and increased temperature, heart rate, and blood pressure. The duration of cocaine's immediate euphoric effects, which include hyper-stimulation, reduced fatigue, and mental clarity, depends on the route of administration.

High doses of cocaine and/or prolonged use can trigger paranoia. Smoking crack cocaine can produce a particularly aggressive paranoid behavior in users. When addicted individuals stop using cocaine, they often become depressed, which may lead to further cocaine use to alleviate depression. Prolonged cocaine snorting can result in ulceration of the mucous membrane of the nose and can damage the nasal septum enough to cause it to collapse. Cocaine-related deaths are often a result of cardiac arrest or seizures followed by respiratory arrest.

Heroin: Heroin abuse is associated with serious health conditions including fatal overdose, spontaneous abortion, collapsed veins, and infectious diseases, including HIV/AIDS and hepatitis. Mental functioning becomes clouded due to depression of the central nervous system. Long-term effects of heroin appear after repeated use for some period of time. Chronic users may develop collapsed veins, infection of the heart lining and valves, abscesses, cellulitis, and liver disease. Pulmonary complications, including various types of pneumonia, may result from the poor health condition of the abuser, as well as from heroin's depressing effects on respiration.

Marijuana: Recent research findings indicate that long-term use of marijuana produces changes in the brain similar to those seen after long-term use of other major drugs of abuse. Someone who smokes marijuana regularly may have many of the same respiratory problems as tobacco smokers. These individuals may have daily cough and phlegm, symptoms of chronic bronchitis, and more frequent chest colds. Continuing to smoke marijuana can lead to abnormal functioning of lung tissue injured or destroyed by marijuana smoke.

MDMA (Ecstasy): MDMA causes injury to the brain, affecting neurons that use the chemical serotonin to communicate with other neurons. The serotonin system plays a direct role in regulating mood, aggression, sexual activity, sleep, and sensitivity to pain. Many of the risks users face with MDMA use are similar to those found with the use of cocaine and amphetamines, such as: psychological difficulties including confusion, depression, sleep problems, drug craving, severe anxiety, and paranoia – during and sometimes weeks after taking MDMA; physical symptoms such as muscle tension, involuntary teeth clenching, nausea, blurred vision, rapid eye movement, faintness, and chills or sweating; and increases in heart rate and blood pressure, a special risk for people with circulatory or heart disease. There is also evidence that people who develop a rash that looks like acne after using MDMA may be risking severe side effects, including liver damage, if they continue to use the drug.

Rohypnol, GHB, and Ketamine: Coma and seizures can occur following abuse of GHB and, when combined with methamphetamine, there appears to be an increased risk of seizure. Combining use with other drugs such as alcohol can result in nausea and difficulty breathing. GHB may also produce withdrawal effects, including insomnia, anxiety, tremors, and sweating. In October, 1996, because of concern about Rohypnol, GHB, and other similarly abused sedative-hypnotics, Congress passed the “Drug-Induced Rape Prevention and Punishment Act of 1996.” This legislation increased federal penalties for use of any controlled substance to aid in sexual assault.

LSD: The effects of LSD are unpredictable. They depend on the amount taken; the user's personality, mood, and expectations; and the surroundings in which the drug is used.

Usually, the user feels the first effects of the drug 30 to 90 minutes after taking it. The physical effects include dilated pupils, higher body temperature, increased heart rate and blood pressure, sweating, loss of appetite, sleeplessness, dry mouth, and tremors. LSD is not considered an addictive drug since it does not produce compulsive drug-seeking behavior as do cocaine, amphetamine, heroin, alcohol, and nicotine. However, like many of the addictive drugs, LSD produces tolerance, so some users who take the drug repeatedly must take progressively higher doses to achieve the state of intoxication they had previously achieved. This is an extremely dangerous practice, given the unpredictability of the drug. The National Institute on Drug Abuse (NIDA) is funding studies that focus on the neurochemical and behavioral properties of LSD. This research will provide a greater understanding of the effects of the drug.

Campus Sex Crimes Prevention Act (CSCPA)

The CSCPA provisions appear in subsection (j) of the Wetterling Act [42 U.S.C. 14071(j)]. As provided in subsection (j), any person required to register under a state sex offender registration program must notify the state concerning each institution of higher education in the state at which the person is a student or works, and of each change in enrollment or employment status of the person at such an institution.

State procedures must also ensure that information concerning a registrant enrolled or working at an institution of higher education is promptly made available to a law enforcement agency having jurisdiction where the institution is located, and entered into the appropriate state records or data system.

In accordance with requirements of the CSCPA, information concerning registered sex offenders employed, enrolled as a student, or carrying on a vocation at this institution can be obtained, to the extent permitted by law, by contacting the Parker Police Department—Douglas County Unified Sex Offender Listing (18600 E. Lincoln Meadows Pkwy, Parker, CO 80134) at 303-941-9800 or online at <http://sor.state.co.us>.

Registry information is provided as an awareness tool so that community members may adequately protect themselves and their children from these individuals. Any use of the sex offender registry information to harass, endanger, intimidate, threaten or in any way to seek retribution on an offender through illegal channels is strictly prohibited. Any person who engages or participates in such acts shall be charged criminally.

The Colorado statewide sex offender registry maintained by the Colorado Bureau of Investigation is located at <http://sor.state.co.us/>. Questions regarding the statewide registry should be directed to the Colorado Bureau of Investigation's Program Support Unit at (303) 239-4222, or at sor@cdps.state.co.us.

The Utah Department of Corrections manages the state's Sex Offender & Kidnap Offender Registry. However, the Department is not in charge of actively registering offenders nor monitoring an offender's compliance once he or she is registered unless the offender is being actively supervised by Adult Probation and Parole. Ensuring an offender is registered and monitoring compliance is the responsibility of local law enforcement agencies. For information about the registry or registration requirements, contact the Sex Offender & Kidnap Offender Registry by calling (801) 495-7700. <https://corrections.utah.gov>

Final regulations updated this requirement to reference the Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C. 16921)

Crime Prevention

Because RVU believes crime prevention begins with awareness, the University takes every opportunity to heighten that awareness. A Crime Prevention initiative has been established within Campus Safety & Security to help students; faculty and staff understand the potential hazards of campus life. Campus Safety & Security provides crime prevention programs, which include the following:

Sexual Assault Education: In order to teach students how to prevent all types of sexual assault, including date rape, RVU provides literature, and information on counselors that specialize in sexual assault and harassment. New student orientations cover topics such as crime prevention and victim awareness, Safety & Security on campus, sexual assault prevention and education, and drug and alcohol awareness.

Violence Education and Prevention: an annual program is in place to educate the campus community and help prevent the crimes of Domestic Violence, Dating Violence, Sexual Assault, and Stalking. This program encompasses all of the abovementioned topics and is part of the university's VAWA minimum requirement regulations.

Safe walk: program allows students and staff to call Security Officers at any time of the day or night for an escort on campus.

Silent Witness: The Campus Safety & Security crime prevention initiative, an anonymous Help/Tip Hot Line was implemented for the purpose of providing our students a means to convey safety and security concerns with anonymity by calling 303-708-8185 (Parker) or 435-222-1313 (Parker).

Security Officers on both campuses also act as Crime Prevention officers that provide valuable safety training tips to students and staff members in different facets of personal safety and awareness.

Sexual Misconduct and Nondiscrimination Policy

Rocky Vista University (the “University”) is committed to the principles of academic and professional excellence and to fostering a positive learning and working environment for its students and employees. Accordingly, the University does not discriminate on the basis of sex in the administration of, or in connection with, its educational and admission policies, scholarship and loan programs, or employment practices, and it is required by Title IX of the Educational Amendments of 1972 to not discriminate in such a manner.

It is the intent of the University to provide its employees and students with an environment free of sexual discrimination, sexual harassment, and sexual violence (collectively “sexual misconduct”), and to respond appropriately to reports of sexual misconduct. The civil and respectful treatment of one another is a foundation of our principles, and the University will not tolerate any form of sexual misconduct. Persons found responsible for sexual misconduct are subject to disciplinary measures, up to and including dismissal or termination, consistent with this Sexual Misconduct Policy and Investigation Procedures (“Policy”) and any other applicable disciplinary procedures.

Definitions and Examples of Sexual Misconduct

In considering sex offenses, the University refers to the laws of Colorado and Utah. While these laws are complex (*containing a variety of technical definitions, distinctions between first- and second-degree offenses, situations constituting statutory rape, etc.*), a summary of the basic elements of sexual assault, sexual battery and other serious sexual offenses would generally encompass the following:

- Nonconsensual or coerced
- Sexual activity
- For purposes of sexual arousal, gratification, or abuse nonconsensual sexual activity takes place when the victim does not or cannot because the victim is mentally or physically disabled, incapacitated or impaired, give intelligent, knowing and voluntary consent. While consent can be expressed in a variety of ways through words, attitude or action, a failure to resist does not, in and of itself, signify consent. Coercion includes force or violence or the threat of force or violence against the victim or someone else, or any other means calculated to cause submission against the victim's will.

Sexual activity includes not only intercourse, but any penetration into a genital or anal opening of a victim with a body part or any object. It also includes other sexual contact such as being touched by or being forced to touch (*with your hand or any other part of your body*) another person's sex organs, breasts, groin, buttocks or anus (*whether clothed or unclothed*)

or being touched in or around any of these places (*whether clothed or unclothed*) by another person. When any of these activities appears to be for the purposes of sexual arousal, gratification, or abuse on the part of one person and is nonconsensual or coerced on the part of the other person, it will constitute a sexual offense.

Sexual Misconduct Offenses include, but are not limited to:

1. Sexual Harassment
2. Sexual Assault
3. Sexual Violence
4. Sexual Exploitation
5. Domestic and/or Dating Violence
6. Stalking

The University considered the Violence Against Women Reauthorization Act of 2013 (VAWA), and for the purposes of this policy the various sexual misconduct definitions listed in the following are by applicable jurisdictions. Definitions may vary by state.

Sexual Harassment constitutes a form of prohibited sexual discrimination and is defined as *unwelcome conduct* (verbal or physical) that unreasonably interferes with an employee's or student's work or academic performance or creates an intimidating or hostile work or educational environment on the basis of an employee's or student's sex or *sexual orientation*, and/or which is directed at, or made because of, an individual's sex or *sexual orientation*. Sexual harassment includes, but is not limited to:

1. Quid Pro Quo Sexual Harassment:

Requests or demands for sexual favors. This includes subtle or blatant pressures or requests for any type of sexual favor, accompanied by an implied or stated promise of preferential treatment or negative consequence concerning one's employment or academic program status. This includes situations wherein:

- a. Submission to such conduct is made to appear to be a term or condition of employment, enrollment, attendance, or participation in class;
- b. Submission to or rejection of such conduct affects employment or academic decisions;
- c. Making sexual propositions or pressuring students or employees for sexual favors; and
- d. Punishing a refusal to comply with or to condition a benefit on a sexual based request or advance.

2. Hostile Work Environment:

Verbal, physical or other behavior of a sexual nature that is reasonably considered unacceptable by an employee or student. This includes, but is not limited to, commenting about an individual's body or appearance when such comments go beyond mere courtesy, telling jokes that are reasonably considered offensive by others, or other tasteless sexually-oriented comments, innuendoes, or actions that reasonably offend others. Examples include, but are not limited to, sexual remarks, jokes, or gestures communicated verbally, in writing, or through electronic means such as:

- a. Writings, pictures, or drawings of a sexual nature (or the displaying or distributing of same);
- b. Websites, social media or e-mails depicting writings, pictures or drawings of a sexual nature;
- c. Telling of sexual or dirty jokes;
- d. Sexual comments about human anatomy that are reasonably considered suggestive, offensive, or reasonably inappropriate;
- e. Spreading sexual rumors or rating other people as to sexual activity or performance;
- f. Simplistic generalizations about gender attributes, differences, and roles of individuals or groups; and
- g. *Sexual exploitation.*

Also, engaging in any type of sexually oriented and *unwelcome conduct* that would unreasonably interfere with another's work or academic program status performance. This includes, but is not limited to:

- a. Extending unwanted sexual attention to someone that reduces personal productivity or time available to work on assigned tasks;
- b. Non-consensual sexual contact or intercourse (or attempts to commit same);
- c. Repeatedly subjecting a person to egregious, unwelcome sexual attention; and
- d. *Stalking.*

Third-Party Sexual Harassment includes persons who are not the target of sexual harassment but who work in environments where sexual harassment is allegedly occurring can file "third party" and "bystander" harassment claims. Third parties who were not directly the target of sexual harassment may be able to bring a claim against the Responding Party if the third party has suffered certain repercussions due to the Responding Party's inappropriate actions.

Sexual Assault is any form of sexual contact without the consent of all parties involved. Sexual contact is the intentional touching, whether with one's own body part, or an

instrument or object, of another person, no matter how slight, in or on, an area of the body generally recognized as being a private part of the body; or the intentional touching of another person, no matter how slight, with one's own private body part anywhere on the other person's body. The amount, or lack thereof, of clothing being worn by either person is of no consequence in determining whether a "sexual physical contact" has occurred, and the body part touched, or used to touch with, may be covered or clothed.

Types of sexual assault may include, but are not limited to:

- rape or attempted rape
- non-consensual, intentional contact with intimate body parts
- non-consensual oral sex
- lewd exposure of one's sexual organs, either in person, in print, or electronically, to another without his or her consent
- any sexual contact between two individuals that, because of the age of the parties, is prohibited under State law.

Sexual Violence constitutes a form of prohibited sexual discrimination and is defined as physical sexual acts perpetrated against a person's will or where a person is incapable of giving *consent* (e.g., due to the person's age or use of drugs or alcohol, or because an intellectual or other disability prevents persons from having the capacity to give consent). A number of different acts fall into the category of sexual violence, including *rape, sexual assault, sexual battery, and sexual coercion*, all of which are forms of sexual discrimination prohibited by this policy.

Sexual Exploitation occurs when a person takes sexual advantage of another person for the benefit of anyone other than that person without that person's *consent*. Examples of behavior that could rise to the level of sexual exploitation include but are not limited to:

- a. Prostituting another person;
- b. Recording images (e.g., video, photograph) or audio of another person's sexual activity, intimate body parts, or nakedness without that person's *consent*;
- c. Distributing images (e.g., video, photograph) or audio of another person's sexual activity, intimate body parts, or nakedness, if the individual distributing the images or audio knows or should have known that the person depicted in the images or audio did not *consent* to such disclosure and objects to such disclosure; and
- d. Viewing another person's sexual activity, intimate body parts, or nakedness in a place where that person would have a reasonable expectation of privacy, without that person's *consent*, and for the purpose of arousing or gratifying sexual desire.

Consent must be informed, voluntary, and mutual, and can be withdrawn at any time. There is no consent when there is force, expressed or implied, or when coercion, intimidation, threats, or duress is used. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent. Silence or absence of resistance does not imply consent. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person. If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature, or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption that meets this standard, or being asleep or unconscious.

Non-Consensual Intentional Sexual Contact is any intentional sexual touching with any object, by any person upon another, without consent and/or by force.

Non-Consensual Sexual Intercourse is any sexual intercourse, however slight, by any person upon another without consent and/or by force.

Dating Violence is the use of physical, sexual or emotional abuse or threats to control another person who is, or has been involved in, a sexual, dating, or other intimate relationship with the victim. Whether there was such a relationship will be gauged by its length, type, and frequency of the interaction.

Domestic Violence is the same as domestic violence committed by the victim's current or former spouse, current or former husband, current or former cohabitant, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.

Stalking means engaging in two or more acts, including but not limited to directly, indirectly, or through third parties, by any action, method, device, or means, following, monitoring, observing, surveilling, threatening, or communicating to or about a person, or interfering with that person's property, that would cause a reasonable person to:

- a. Fear for the person's safety or the safety of others; or
- b. Suffer substantial emotional distress, meaning significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

If there is reason to believe that Rocky Vista University's rules prohibiting sexual assault have been violated, either on or off campus, the administration may pursue disciplinary action through the University's conduct review process and/or through any other available procedures.

RVU strives to be supportive and accommodating for all victims of sexual assault. University representatives from a number of departments such as Campus Safety & Security, Counseling Services (*including the on-call counselor*), Health Services and the University's Title IX Coordinator will make every effort to help in these ways:

1. We will meet with you privately at a place of your choice on campus to take a statement and explain your options.
2. We will treat information that you share with the highest level of discretion.
3. We will not prejudge you.
4. We will treat you and your particular situation with courtesy, sensitivity, dignity, understanding and professionalism.
5. If you feel more comfortable talking with either a female or male counselor or representative, we will do our best to accommodate your request.
6. We will assist you in arranging for any hospital treatment or medical needs.
7. We can assist you in privately contacting law enforcement officials, counseling, Campus Safety & Security advising and other available resources, both on-campus and in the community.
8. We will fully investigate your report with respect and discretion.
9. We will continue to be available for you to answer your questions, explain the systems and processes involved, and be willing listeners.
10. We will consider your report seriously, regardless of your gender or the gender of the alleged violator.

Sexual Misconduct Reporting and Investigating Procedures

Rocky Vista University is committed to maintaining an academic climate in which individuals of the University community have access to an opportunity to benefit fully from the University's programs and activities. When students experience acts of sexual

misconduct, their sense of safety and trust is violated. This can significantly interfere with their lives, including their educational goals. These procedures have been developed to proactively create a campus environment in which incidents of sexual misconduct can be promptly and effectively responded to without further victimization, retaliation, and with possible remediation of its effects.

Rocky Vista University prohibits sexual assault, sexual battery, and other unlawful sexual activity, and offers programs aimed at the prevention of sexual offenses. These offenses are violations of state criminal law as well as the university's Student Code of Conduct. (The University also provides these policies and programs regarding sexual assault in the catalog located on the university's website: <http://www.rvu.edu/>.)

Any individual who believes that an employee or student of the University, including him or herself, has been subjected to sexual misconduct is encouraged to immediately follow the applicable investigation procedure and may also pursue criminal, civil, and/or administrative remedies provided by federal and state law. The University encourages all individuals to report possible sexual misconduct that they suffer or observe, and requires responsible employees of the University to do so, in accordance with Section II, Parts A and B, of this Policy.

The purpose of these reporting, investigation and hearing procedures is to provide prompt and equitable processes for addressing and investigating incidents of sexual misconduct allegedly committed against students and employees. A lengthy period of time between an alleged occurrence and an investigation may make fact-finding more difficult; therefore, individuals are encouraged to raise concerns and complaints as soon as possible.

Amnesty for Alcohol and/or Other Drugs

Sometimes, a student or employee may be hesitant to come forward and file a sexual misconduct investigation request out of concern that the student or employee was using or was under the influence of alcohol or illegal drugs at the time of the alleged incident. However, the University's primary interest in such situations is in addressing alleged sexual violence. Illegal alcohol or drug use never makes a Reporting Party at fault for sexual violence against him or her. Other rules violations will be addressed separately from a sexual violence allegation.

Procedures Applicable to Requests for Investigations of Allegations of Sexual Misconduct

The following procedures apply to all Requests for Investigation alleging sexual misconduct or sexual violence. Under these procedures, individuals may submit Requests for Investigation regarding sexual misconduct allegedly committed by University students,

employees, or other third parties which occur either inside of a school program or outside of a school program if the conduct negatively affects a Reporting Party's school experience or the overall school environment, including Requests for Investigation relating to preceptors in the field.

However, the University's response to cases involving visitors, preceptors, or third parties unaffiliated with the University will depend upon the University's degree of control over the visitor or third party. This procedure also applies to Requests for Investigation related to Third Party Sexual Harassment allegedly suffered by students.

The University will investigate all incidents of sexual misconduct of which it becomes aware (such as through a responsible employee or observation of misconduct), regardless of whether anyone files an informal or formal Request for Investigation. In such a circumstance, the University is the Reporting Party. The University will elect how to proceed in such a situation, in accordance with its obligation to provide a safe, nondiscriminatory educational environment under Title IX and applicable due process laws. At the conclusion of any process, the University will take steps to prevent recurrence of sexual misconduct and to correct its discriminatory effects on the Reporting Party, and others, if appropriate.

The investigation and any related process will be conducted impartially without any real or perceived conflicts of interest between the fact-finder or decision-maker and the parties. Any perceived conflicts will be fully disclosed at the beginning of the investigation. The precise investigation process will depend upon the nature of the allegations and other circumstances, but will afford both parties equal processes and procedures as described in this policy.

A preponderance of the evidence standard of review (meaning it is more likely than not that the sexual misconduct occurred) will be used in any investigations conducted and decisions made under these policies and procedures. The alleged victim or the University acting on behalf of the alleged victim of the sexual misconduct is described as the Reporting Party. The alleged offender is described as the Responding Party. The Reporting Party has the option to inform the Responding Party that his or her actions are offensive, unwelcome, or inappropriate, but is not required to do so, as this may negate the reporting of possible offenses and place the Reporting Party in an uncomfortable, difficult, or fearful position.

The University's investigation process concerning allegations of sexual misconduct alleged to have occurred against a student will be promptly completed, ordinarily within 30 days of the University's first receiving notice of the Request for Investigation, absent extenuating circumstances such as an appeal, parallel criminal investigation, or the need for certain

evidence or testimony unavailable within the typical timeframe. Both parties will be notified, in writing, of the outcome of any investigation or appeal, to the extent permitted by university policy; usually, this will occur within 14 days of the conclusion of any investigation or appeal, absent extenuating circumstances.

Both parties will be promptly notified of any deviations from these time estimates, and the reasons for any deviation, as determined and approved by the Title IX Coordinator after considering the nature and seriousness of the allegations, and any extenuating circumstances. If the process lasts longer than 30 days, each party will be provided periodic status updates until the process is completed.

Procedures for Reporting and Investigating Sexual Misconduct

Below are the applicable procedures for reporting and investigating sexual misconduct allegedly committed by a: **(A)** Student or **(B)** Employee.

A. Investigation Requests for Sexual Misconduct or Sexual Violence Allegedly Committed by a Student

The University provides three different processes, described below, for investigating and adjudicating Requests for Investigation of sexual misconduct allegedly committed by students. The first two options address Requests for Investigation alleging misconduct other than sexual violence: an Informal Conciliation Process and a Formal Investigation Process, and a third process is available only for Sexual Violence Requests for Investigation: the Sexual Violence Response Process. (The University highly recommends that the Reporting Party of sexual violence seek immediate medical attention after the incident, The Title IX Coordinator or Sexual Assault Advocate will provide, if needed, referrals to medical professionals.)

If the student is unsure about the appropriate process for a Request for Investigation or unsure whether he/she should file a Request for Investigation, contact the Title IX Coordinator for an initial meeting, wherein the Title IX Coordinator will discuss the options and answer any questions. Copies of this Policy and Request for Information forms are available from the Title IX Coordinator and on the RVU website at <http://www.rvu.edu/campus-life/campus-safety-and-security/>.

1. Informal Sexual Misconduct Conciliation Request. The University offers an informal conciliation process as an alternative to the Formal Investigation Process for Requests for Investigation alleging sexual misconduct other than sexual violence. Upon the filing of an informal Request for Investigation, the Title IX Coordinator will attempt to intervene in order to reach a satisfactory resolution

between the individuals directly involved. The informal proceeding focuses on conciliation rather than culpability and therefore does not involve a sanctioning process.

The Reporting Party and Responding Party will be asked to resolve the problem with the mediation of a University official. This may include the services of the Office of Student Affairs and/or the Office of Human Resources. If informal attempts to resolve the Request for Investigation are unsuccessful, or if the Reporting Party or the Title IX Coordinator believes an informal procedure is inappropriate, the Formal Investigation Process can be utilized at any time. The filing of an Informal Sexual Harassment or Sexual Discrimination Request for Investigation is not a prerequisite to a Formal Sexual Harassment or Sexual Discrimination Request for Investigation.

- a. If a Reporting Party wishes to try informal resolution, she/he will be asked to file an *RVU Informal Sexual Harassment or Sexual Discrimination Request for Investigation* (included in this procedures document). Upon receipt of this Request for Investigation, an attempt will be made to resolve the Request for Investigation by conciliation leading to informal mutual agreement.
- b. In order to conciliate an Informal Sexual Harassment or Sexual Discrimination Request for Investigation, the Title IX Coordinator may meet with the parties and their respective advisers separately, together, or both, and may permit both parties to present evidence. The purpose of the meetings is to clarify issues and resolve the Request for Investigation.
- c. If conciliation resolves the Request for Investigation, a conciliation agreement, stipulating the terms of the resolution, will be signed by the Reporting Party and the Responding Party. Each party will be simultaneously given a copy of the final signed agreement.
- d. If the conciliation process is not successful and the Reporting Party wishes to proceed with the Formal Investigation Process, the Reporting Party should follow the instructions set forth below.

The Reporting Party has a right to end the Informal Conciliation Process at any time and begin the Formal Investigation Process. Informal options will not be used to resolve Requests for Investigation concerning sexual violence allegedly committed by a University student, which will be referred directly to the Sexual Violence Response Process.

2. Formal Sexual Misconduct Investigation Process. If a Reporting Party wishes to invoke a formal administrative action regarding sexual misconduct other than

sexual violence, an *RVU Formal Sexual Harassment or Sexual Discrimination Request for Investigation* (included with this Policy) may be filed with the Title IX Coordinator.

- a. All Requests for Investigation will be acknowledged and promptly investigated and may include interviews with the Reporting Party, the Responding Party, and other persons believed to have knowledge relevant to the allegations.
- b. Both the Reporting and Responding Party may present evidence to the Title IX Coordinator.
 - i. Questioning or evidence about the Reporting Party's prior sexual conduct with anyone other than the Responding Party is prohibited.
 - ii. Evidence of a prior consensual dating or sexual relationship between the parties by itself does not imply consent or preclude a finding of sexual misconduct.
- c. Both the Reporting and Responding Party will receive the Title IX Coordinator's findings letter concurrently.
- d. Upon the conclusion of the investigation of a formal Request for Investigation, a written investigative findings report and recommendation will be prepared and submitted to the Associate Dean of Student Affairs. The Associate Dean will issue a final determination on the Formal Request for Investigation to the Reporting Party and Responding Party. The final decision of the Associate Dean may include remedial measures if a violation of this Policy is found, such as a referral to the appropriate University administrative office for disciplinary action, including suspension or dismissal.

3. Sexual Violence Response Process. Requests for Investigation alleging sexual violence committed by a University student or employee will be referred to the Sexual Violence Response Process, which recognizes that outside law enforcement agencies may be simultaneously investigating and prosecuting the alleged offense. The process is initiated by the filing of a *Sexual Violence Request for Investigation* (included in this Policy). The University's specific response will be tailored to the circumstances alleged and will, in all cases, be carried out consistently with the University's Title IX obligations and in such a way that it does not impair any external criminal investigation or prejudice the rights of the alleged Reporting Party/Reporting Party or Responding Party to be treated fairly and afforded as prompt a resolution as permitted by the circumstances. For example, the University may, consistent with its obligations under Title IX, defer

to the *Interim Measures during Investigation Procedures* described herein during the pendency of the outside proceeding.

- a. All Requests for Investigation will be acknowledged and promptly investigated and may include interviews with the Reporting Party, the Responding Party, and other persons believed to have knowledge relevant to the allegations.
- b. Both the Reporting and Responding Party may present evidence to the Title IX Coordinator.
 - i. Questioning or evidence about the Reporting Party's prior sexual conduct with anyone other than the Responding Party is prohibited.
 - ii. Evidence of a prior consensual dating or sexual relationship between the parties by itself does not imply consent or preclude a finding of sexual misconduct.
- c. Both the Reporting and Responding Party will receive the Title IX Coordinator's findings letter concurrently.
- d. Upon the conclusion of the investigation of alleged sexual violence, a written investigative findings report will be prepared and submitted to the Associate Dean of Student Affairs. The Associate Dean will issue a final determination on the alleged sexual violence to the Reporting Party and Responding Party. The final decision of the Associate Dean may include remedial measures if a violation of this Policy is found, such as a referral to the appropriate University administrative office for disciplinary action.

Student Submission of Requests for Investigation of Sexual Misconduct or Sexual Violence

All Requests for Investigation alleging an incident of sexual misconduct or violence committed by a student should be mailed, emailed, or hand delivered to:

- **The University's Title IX Coordinator:** Laura Dement, 720-874-2481, ldement@rvu.edu, President's Suite, Room PR-104. The Title IX Coordinator is responsible for investigating all Requests for Investigation of sexual misconduct or sexual violence, and for identifying and addressing any patterns or systematic problems that arise during the review of such complaints. The Title IX Coordinator is available to meet with University students to discuss related issues, as needed.

If the Title IX Coordinator is not available, or there is a potential conflict of interest with the Title IX Coordinator, informal and formal Requests for Investigation the investigation

request should be mailed, emailed, or hand delivered to the Deputy Title IX Coordinator for Students:

- **The Office of Student Affairs:** Amy Schlueter, Associate Dean; 720-874-2483; aschlueter@rvu.edu; Room FF-05.

Student Appeals of Formal Sexual Misconduct or Sexual Violence Findings

Each party in a Formal Sexual Misconduct or Sexual Violence Investigation may appeal the findings or sanction determined by the Title IX Coordinator by filing a written appeal with the University President within fourteen (14) days of the date of the decision. The opposing party then may respond to the appeal, in writing, within fourteen (14) days. Both the Reporting and Responding Party may review the Title IX Coordinator's investigative report upon filing an appeal.

Appeals must meet the following criteria:

- An error in procedure, which allegedly prejudiced the process to the extent the participant was denied a fundamentally fair investigation as a result of the error. Only significant procedural errors that may have affected the decision or which relate to the sanction imposed will be considered.
- New evidence that was previously unknown and became available during the appeal process that could substantially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included with the notice of appeal.
- Sanctions imposed are not appropriate for the violation the individual(s) committed.
- Clearly demonstrated investigator bias.

All appeal documentation shall be directed to University President, Dr. Clinton Adams, 720-875-2879, President@rvu.edu, President's Suite, Room PR-106 on the Colorado campus. Dr. Adams will issue a written decision to both parties within fourteen (14) days of receiving the opposing party's response. There are no further appeal opportunities, and Dr. Adam's decision shall be the final decision regarding the Sexual Violence Request for Investigation.

B. Procedures Applicable to Complaints of Sexual Misconduct Allegedly Committed by an Employee

The following procedures apply to all complaints of sexual misconduct alleged to have been committed by an employee, including sexual misconduct allegedly committed by an employee against a student.

The Reporting Party should select one of the three different processes, described in Section A for investigating and adjudicating Requests for Investigation of sexual misconduct allegedly committed by students. The appropriate investigation request should be brought to the Title IX Coordinator's attention ideally within seven (7) days of the offending conduct.

Additionally, any manager or supervisor who observes conduct in violation of this Sexual Misconduct Policy must promptly report the conduct to the University's Title IX Coordinator, who may involve the Office of Human Resources or legal counsel if deemed appropriate.

Managers and supervisors must not conduct their own interviews or investigations. The University will evaluate the investigation request and, in its sole discretion, will determine whether and how to conduct an investigation of the allegations in a prompt and equitable manner. If the University concludes that conduct violated this Sexual Misconduct Policy, it may impose appropriate disciplinary sanctions on the Respondent, up to and including termination or dismissal.

Complaints regarding violations of this Policy committed by an employee should be directed to the University's Title IX Coordinator:

- **The University's Title IX Coordinator:** Laura Dement, 720-874-2481, ldement@rvu.edu, President's Suite, Room PR-104 on the Colorado Campus. The Title IX Coordinator is responsible for investigating all complaints of sexual discrimination, sexual harassment, and sexual violence, and for identifying and addressing any patterns or systematic problems that arise during the review of such complaints. The Title IX Coordinator is available to meet with University employees to discuss related issues, as needed.

If the Title IX Coordinator is not available, or there is a potential conflict of interest with the Title IX Coordinator, informal and formal complaints alleging an incident of sexual misconduct committed by an employee should be mailed, emailed, or hand delivered to the Deputy Title IX Coordinator for Employees:

- **The Office of Human Resources:** Mr. Jerry Armstrong, 720-874-2475 or jarmstrong@rvu.edu, Administration Suite, Room C-105 on the Colorado Campus.

Disciplinary Proceedings

All disciplinary proceedings will be conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

The University will provide the accuser and the accused with the same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The University will also not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding; however, the institution may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties.

Interim Measures During Investigation Procedures

Sometimes it is necessary to take steps before or during a formal investigation or an investigation of alleged sexual assault to protect the rights and interests of the parties involved. Such measures may be designed to reduce or eliminate contact between the involved parties so that they may feel safe in their education environment. Protective measures may also guard against further actual or perceived discrimination, harassment, violence or retaliation.

Protective measures may include temporary changes in working conditions (such as changes to supervisor or office location), directives to the involved parties to avoid personal contact or refrain from such contact without a neutral third person present, temporary suspension of an employee with or without pay, or temporary suspension of a student or students. As soon as practicable after receipt of a Request for Investigation, the University will make changes to a student Reporting Party's academic situations if requested and reasonably available. If interim measures are being taken due, at least in part, to a delay occasioned by the pendency of a criminal investigation and/or prosecution, the University will continue to update the parties on the status of the investigation and inform the parties when the school resumes its Title IX investigation.

No Contact Order

During a formal investigation or an investigation of alleged sexual violence, the Title IX Coordinator or Campus Safety and Security may issue a "No contact" order to insure the well-being of all parties and/or the integrity of the investigation process. Both the Reporting and the Responding Party are expected to avoid all contact with each other while the report is under investigation.

"No contact" means no communication whatsoever including direct communication (talking, calling, texting, etc.), indirect communication (through friends or third parties), or contact through social media (Facebook, Twitter, etc.). The "No contact" order does not imply any wrongdoing. Violation of the "No contact" order, however, is considered a

serious and potentially threatening breach of university policy and may result in immediate suspension.

Role of Attorneys in Formal and Sexual Violence Response Processes

A Reporting or Responding Party may choose to seek the advice and assistance of an attorney at their own expense. An attorney may serve as a non-participating, support person but cannot be a witness in the response process. Additionally, the University will not recognize or enforce agreements between the parties reached outside of these procedures.

False Reports/Allegations

A false report or allegation of Sexual Misconduct occurs when the Reporting Party intentionally reports information or incidents that he or she knows to be untrue. Failure to prove a complaint of Sexual Misconduct is not equivalent to a false report or allegation. The University may impose sanctions against an individual who knowingly makes false allegations of Sexual Misconduct.

Record of Request for Investigation and Decision

The record of the Request for Investigation, if any, and final decision shall be retained in a confidential and secure file in the Title IX Office.

Sanctions

Student Violations of the Sexual Misconduct and Non Discrimination Policy may result in sanctions including, but not limited to: Suspension, Expulsion, No Contact Orders, or Change of Course Schedules.

Employee Violations of the Sexual Misconduct and Non Discrimination Policy may result in sanctions including, but not limited to: Directed Time Off with or Without Pay, No Contact Orders, or Termination of Employment.

Audio/Video Recording of Proceedings

Individuals involved in the investigative process are not permitted to audio or video record any investigation or resolution meetings or other portions of the process.

Notification of Final Results

The University will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of

such crime of offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Confidentiality Options for Reporting Parties of Sexual Violence

The University recognizes that some alleged Reporting Parties of sexual violence may wish to remain anonymous or for the information they disclose to be confidential. Throughout the complaint procedures (whether formal or informal), the confidentiality of all participants will be maintained to the fullest extent possible. However, different individuals both on and off campus have different abilities to maintain a Reporting Party's confidentiality based upon applicable law, including Title IX.

The following options are designed to make students and employees aware of the disclosure options available to them, and the University encourages students to talk to someone in one or more of these groups. The University also reminds students and employees of its prohibition against retaliation located in Section V of this Policy, and if the student or employee is concerned about retaliation from the alleged Responding Party, the University will take steps to prevent retaliation and take strong responsive actions to retaliatory conduct.

- ***Professional and Pastoral Counselors:*** These professionals, including the University's clinical psychologist, are bound by professional ethics to not release information without the patient's permission, except in circumstances where the counselor or health care provider believes that there is a serious threat of imminent physical violence to a specific person or persons, or as otherwise required or permitted by applicable law.
- ***Responsible Employees of the University:*** Responsible employees of the University are obligated to report incidents of possible sexual violence to school officials, including the Title IX Coordinator. A responsible employee is defined as University employee who has the authority to redress sexual violence, who has been given the duty of reporting incidents of sexual violence or any other misconduct to students to the Title IX coordinator or other appropriate school designee, or who a student could reasonably believe has this authority or duty. Therefore, reporting to a responsible employee is not confidential. Examples of responsible employees include, but are not limited to: Campus Safety and Security Officers, Faculty members, Human Resources representatives, and Student Affairs personnel.
- ***Anonymous Reporting for Alleged Sexual Violence:*** Reporting Parties of alleged sexual violence are permitted to submit an anonymous Sexual Violence Request for Investigation or call the RVU Anonymous Help/Tip Line by dialing 303-708-8185 (Parker) or 435-222-1313 (Ivins). The University may act then on behalf of the

Reporting Party and act as Reporting Party on behalf of the student. However, the student must understand that remaining anonymous will impede the University's ability to investigate and respond to the complaint.

- ***Filing a Request for Investigation or Reporting to a Responsible Employee with a Confidentiality Request:*** A student Reporting Party of alleged sexual violence may ask that a Request for Investigation or report to a responsible employee be handled confidentially or that an investigation not be completed. In such a situation, the University must weigh the student's request against the University's obligation to provide a safe, non-discriminatory environment for all of its students and employees. If the University honors the student's request for confidentiality, the student must understand that the University's ability to meaningfully conduct an investigation into the sexual misconduct will be impeded, including the ability to sanction the alleged Responding Party. However, in some cases the University may not be able to honor a student's request for confidentiality in order to provide a safe, non-discriminatory environment for all of its students and employees.

The Title IX Coordinator will evaluate requests for confidentiality in accordance with the following factors:

- The risk that the alleged Responding Party will commit additional acts of sexual misconduct;
- The severity of the sexual misconduct;
- Whether sexual violence or a weapon was involved;
- Whether the report reveals a pattern of perpetration at a given location or by or against a particular group;

If the University determines that it cannot maintain a student's confidentiality, it will, to the extent possible, inform the student prior to taking any action that would disclose the student's identity, and will, to the extent possible, only share information with people responsible for handling the University's investigation and response. The University may not require the student requesting confidentiality to participate in the investigation.

Regardless of whether the University honors a request for confidentiality, the University will promptly take any possible steps to protect and assist the student or prevent future sexual misconduct, such as increased monitoring or security at locations where reported sexual misconduct occurred and increased education and prevention efforts.

Mandatory Reporting of Allegations of Sexual Violence by Responsible Employees

A responsible employee is defined as a University employee who has the authority to redress sexual violence, who has been given the duty of reporting incidents of sexual violence or any other misconduct to students to the Title IX Coordinator or other appropriate school designee, or whom a student could reasonably believe has this authority or duty. Therefore, reporting to a responsible employee is not confidential. Examples of responsible employees include, but are not limited to: Campus Safety and Security Officers, Campus Security Authorities, Human Resources representatives, Student Affairs personnel and the Title IX Coordinator.

Any time a responsible employee of the University is made aware of a situation that may be reasonably construed as sexual violence against a University student or employee, he or she must immediately contact the Title IX Coordinator listed above for an investigation and follow-up. The responsible employee must not conduct his or her own interview or investigation. The University is obligated by law to investigate any Sexual Violence Request for Investigation against a student, even if a Reporting Party states that he/she does not wish to pursue it further.

In cases involving Reporting Parties who do not wish to pursue a Request for Investigation further, the University will conduct an investigation and take whatever remedial action may be possible and appropriate under the circumstances, consistent with guidance issued by the United States Department of Education and the University's obligations to other members of the University community. Failure by a responsible employee to report an allegation or incident of sexual violence against a student to the Title IX Coordinator may result in disciplinary action up to and including termination.

Prohibition of Retaliation

The University prohibits retaliation against any employee or student who, in good faith, reports, rejects, protests, or complains about sexual misconduct. Retaliation is a violation of University policy. The University will not tolerate discrimination, recrimination, or reprisal against any employee or student who reports or participates under this policy in good faith in a related investigation or hearing.

Complaints of retaliation should be reported to the Title IX Coordinator listed above. Such complaints will be investigated and handled in a prompt and equitable manner by the Title IX Coordinator, in his or her discretion. Any individuals, including Reporting Parties and alleged Reporting Parties, who are determined to have made knowingly false statements during the course of a sexual misconduct investigation, may be subject to discipline, which may include termination or dismissal.

Education and Prevention Programs

Both RVU Campuses maintain sexual assault education and prevention programs focused on risk reduction, sexual assault prevention and responses to sexual assault. Literature dealing with issues of sexual assault is available in Health Services, Campus Safety & Security and the student lounge areas.

Education programs promote awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses. RVU takes a proactive stance to educate its student body regarding issues of sexual assault and methods of prevention.

Awareness Programs: refers to programs, campaigns, or initiatives that increase audience knowledge of the issues of sexual assault, domestic violence, dating violence and stalking and share information and resources to prevent interpersonal violence, promote safety, and reduce perpetration. These efforts can include campus communitywide mobilizations as well as targeted audience specific programming (including both students and employees) throughout the year starting during orientation. Awareness month campaigns, "Speak Outs," rallies or marches, informational poster campaigns or resource websites, and educational programming that focuses on sharing resources and information about these issues are examples of awareness programs

Bystander Intervention: refers to safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene in situations of potential harm when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the individual. Effective bystander intervention training prepares participants to recognize situations of potential harm, overcome barriers to intervening, identify safe and effective intervention options, and take action.

Ongoing prevention and Awareness campaigns: refers to campaigns that are sustained over time focusing on increasing awareness or understanding of topics relevant to SA, DV, DaV, and stalking prevention via our Prevention and Education Program and Sexual Assault Awareness Month. These programs will occur at different levels throughout the institution (i.e. faculty, athletics, incoming students) and will utilize a range of strategies. Ongoing awareness and prevention campaigns may include information about what constitutes sexual assault, dating violence/intimate partner abuse, and stalking, changing social norms, promoting recognition of perpetrator tactics, enhancing understanding of consent, and advancing prosocial behaviors of individuals and communities. Effective ongoing awareness and prevention campaigns will include developmentally appropriate content for the specific audience and their knowledge and awareness level and provide positive and concrete ways for individuals to get involved

Primary prevention programs: refers to programming, initiatives and strategies intended to stop domestic violence, dating violence, sexual assault, or stalking before it occurs to

prevent initial perpetration or victimization through the promotion of positive and healthy behaviors and beliefs. Efforts to change behavior and social norms, and promote healthy relationships, healthy sexuality and egalitarian gender roles, or efforts to understand risk factors and protective factors for bystander inaction and change social norms around bystander inaction are all examples of primary prevention.

Risk reduction: refers to approaches that seek to mitigate risk factors that may increase the likelihood of perpetration, victimization, or bystander inaction. Risk reduction focuses on helping individuals and communities address the institutional structures or cultural conditions that facilitate SV, DV & stalking to increase safety. Examples of risk reduction may include but are not limited to general crime prevention education, campus escort programs, programs that educate on how to create individual and community safety plans and strategies, and bystander intervention programs that educate the campus on how to recognize and interrupt situations of harm, or implementing a communications system that can notify the entire campus community of immediate threats to security, student monitor slides and flyers.

Tips to Reduce Risk of Sexual Assault and Misconduct Men and women should be aware of the subsequent information to help protect themselves against acquaintance rape and stranger rape sexual violence, intimate partner violence, and sexual assault on campus. The following are some tips to reduce the risk of being a victim:

- Avoid isolated settings. When you begin dating a new person, go to public places or go with other people.
- Clearly express your expectations and limits to your date.
- Be suspicious if drugs or alcohol are being forced on you. These can be used to decrease your defenses and reactions. They can also impair your judgment.
- Carry enough money to take a cab home if you have to get away. Carry your cell phone or enough change in case you need to use a pay phone.
- Tell someone the name of your date and where you are going before your date.
- Pay attention to warning signs such as being very demanding, talking in degrading ways about you or men or women in general, being irrationally suspicious or jealous, or touching you when you've said "no."
- Make an assertive refusal — hurting his/her feelings or your own embarrassment are less important than your own safety.
- Do not let your date intimidate you. If you feel uncomfortable, trust your instincts and get away from him or her.
- Trust your feelings. Gut instincts are often a sign of potential danger.
- Stay around other people.
- Avoid accepting rides from new acquaintances.
- Don't drink beverages you don't open yourself.

- Go to parties with friends that you trust. Make arrangements to watch out for each other and meet up periodically to make sure that you are all okay.

To protect against sexual assault:

- Know your sexual intentions and limits. You have the right to say “No” to any unwanted sexual contact. If you are uncertain about what you want, ask the other person to respect your feelings.
- Communicate your limits firmly and directly. If you say “No,” say it like you mean it. Don’t give mixed signals. Back up your words with a firm tone of voice and clear body language.
- Remember that some people still think that drinking heavily, dressing provocatively, or going to a person’s room automatically indicates a willingness to have sex. Be especially careful to communicate your limits and intentions clearly in such situations.
- Listen to your gut feelings. If you feel uncomfortable or think you may be at risk, leave the situation immediately and go to a safe place.
- Don’t be afraid to make waves if you feel threatened. If you feel you are being pressured or coerced into sexual activity against your will, don’t hesitate to state your feelings and get out of the situation; better a few minutes of social awkwardness or embarrassment than the trauma of sexual assault.
- Be alert to your surroundings and other people. Stay in populated, well-lit areas.
- Don’t walk alone at night. If you must walk alone, advise a friend of your route and estimate time of arrival/return. If you feel in danger, walk, jog, or run toward people of traffic. Draw attention to yourself by yelling, screaming, etc. If you are being followed, go to a house with lights on or to the middle of the street. Make a scene.
- If a driver stops you near the street or in a parking lot, avoid getting near the car. Do not get into the car.
- Have direct eye contact with persons approaching you. Respond immediately and assertively to questions or statements they make. These behaviors prevent you from being identified as an easy victim.
- On campus, avoid short-cuts through empty buildings, vacant lots, or areas that are poorly lit or hidden by shrubs and trees.

If you are assaulted:

- Try to stay calm so you will be able to gather information and make decisions.
- Evaluate the situation for possible ways to escape. If one method doesn’t work, look for another escape opportunity.

- Draw attention to yourself if there are other people around - scream, swear, yell “fire” or “help,” break a window, etc.
- Resist as long as it is safe to do so. If resistance is too dangerous, stop resisting.
- Claim to be sick, pregnant, have a venereal disease, or to have AIDS.
- Act hysterical, insane, or mentally incapacitated.
- If you are assaulted, do not shower, change clothes, or douche until you make a decision about reporting to the police or going to the hospital. You may request a female officer. While you will be encouraged to talk to the police, you have the right to obtain medical assistance and not talk to the police.
- Remember: You are not trying to win; you are trying to survive.
- If you are assaulted, remember that there are resources available to victims/survivors of assault.

Steps to Follow After a Sexual Assault

If you believe you are the victim of a sexual assault or other sex offense, you should take the following steps:

1. Go to a safe place.

2. Tell someone. Your options include:

- Reporting the assault to Law enforcement authorities by dialing 911 or contact the appropriate police department.
- Reporting the assault to Campus Safety & Security 720-875-2892 (Colorado), 435-222-1300 (Utah) or a Health Services staff member; and/or
- Making a complaint to the University's Title IX Coordinator, Laura Dement at 720-874-2481 and/or
- If you choose not to report the assault, but to seek only counseling assistance, contact Health Services directly at 720-875-2896 (Colorado), or 435-222-1271 (Utah). Without disclosing any details of the incident, or asking Campus Safety & Security to contact the on-call counselor.

Victims have the right to decline notifying authorities, however RVU strongly urges students to report sexual assaults to local police and Campus Safety & Security so that the University can take appropriate measures to provide help to the victim and prevent future assaults.

3. Seek medical attention immediately.

Both male and female students can be victims of sexual assault. Victims are encouraged to go to the nearest hospital (*see hospitals listed under "Community Help" below*). Medical attention is critical so that any injuries (*including internal injuries*) or infections which may have resulted from the assault can be treated. Getting an exam does not mean that you have to press charges; however, a medical exam will help to preserve evidence if you should choose to press charges at some point.

4. Preserve and record evidence, including the following:

- Do not wash anything (including your hands, mouth and face).
- Do not wash or comb your hair.
- Do not shower, douche or change your clothes.
- Bring an extra set of clothes with you to the hospital.
- Record a description of the assailant (including type of clothing, race, age, height, weight, hair color, eye color, distinguishing marks, etc.) and
- Record where the assault occurred and the description and direction of travel of any vehicle involved.

5. Seek additional help, counseling and assistance.

The single most important thing a sexual assault victim can do is tell someone as in the police, a friend, a community-based rape crisis center, a counselor. Don't isolate yourself, don't feel guilty, don't blame yourself and don't just ignore it. Sexual assault, whether by a stranger or by someone you know, is a violation of your body and your trust.

The organizations and departments under "Community Help & Victim Resources" in pages 48- 51 can provide or arrange for immediate support and response, including arrangements for emergency services, if needed; transportation to medical resources; contact with local authorities; information regarding criminal and civil proceedings and/or the University's student reporting and investigative procedures; advocacy services; community counseling services; and assistance with personal safety concerns.

Victim's Rights

Victims of crimes listed have the right to:

- Be treated with fairness, respect and dignity
- Be informed of and present for all critical stages of the criminal justice process

- Be informed about what steps can be taken and protections can be afforded if he/she is subjected to any intimidation or harassment
- Notification of any change in the status of the accused including release or discharge from the county jail
- Information on charges filed
- Information on charges not filed in misdemeanor cases
- Have Social Security Number redacted from criminal justice documents if released to the public
- Assurance of swift and fair resolution of the proceedings
- Consult with the District Attorney prior to any disposition of the case or before a case goes to trial and be informed of the final disposition of the case
- Be informed of the status of the case and any scheduling changes or cancellations
- Prepare a Victim Impact Statement and to be present and/or heard at sentencing
- Restitution and to be informed of the right to pursue a civil judgment
- Prompt return of the victim's property when no longer needed as evidence
- Information on the availability of financial assistance and community services
- Appropriate employer intercession services regarding court appearances and meetings with criminal justice officials
- Whenever practical, be able to have a safe, secure waiting area
- Be informed of the results of any court-ordered HIV testing
- Be informed of any post-conviction proceedings related to DNA issues
- Inform victims of certain cold cases of any change in status of the case
- Upon written request, provide victims of cold cases for which the crime has a statute of limitations of longer than three years, an annual update concerning the status of the case
- To be informed of any rights which the victim has pursuant to the Constitution of the United States or the State of Colorado
- Request a copy of the law enforcement report and other documents related to the case, including the right to receive a free copy of the initial incident report. The release of any such documents associated with the investigation is at the discretion of the law enforcement agency based on the status of the case
- If a victim or victim's designee is unavailable to be present for the critical stages described in this section and the victim or the victim's designee wishes to address the court, the right to request that the court, within the court's resources, arrange and provide the means for the victim or the victim's designee to provide input to the court beyond a written victim impact statement
- Be informed of the existence of a criminal protection order under section 18-11001, C.R.S. or section 19-2-207, C.R.S, and upon request of the victim, information about provisions that may be added or modified and the process for requesting such an addition or modification.

Victim Advocate Assistance

Parker Police Department

Victim Advocate Unit

18600 E. Lincoln Meadows Pkwy.
Parker, CO. 80134
303-805-6601

Douglas County Sheriff's Office

Victim Advocate Unit

4000 Justice Way
Castle Rock, CO. 80138
303-660-7535

St. George Police Department

Victim Advocates

175 E. 200 N.
St. George, UT 84770
435-627-4000

Colorado Victim Resources

Colorado Organization for Victim Assistance

www.coloradocrimevictims.org
800.261.2682

Colorado Coalition Against Sexual Assault

www.ccasa.org
303.861.7033

Colorado Coalition Against Domestic Violence

www.ccadv.org
888.778.7091

Colorado Victim Compensation Program

http://dcj.state.co.us/OVP/comp_english.htm
888.282.1080

Utah Victim Resources

Dixie Regional Medical Center

<http://intermountainhealthcare.org/locations/dixie-regional-medical-center//>
800-784-2433

Crisis Shelter- Dove Center

<https://dovecenter.org/>
435-628-1204

Utah Office for Victims of Crime

https://justice.utah.gov/Crime/cvr_grants.html

800-621-7444

Utah Domestic Violence Hotline

Udvc.org

800-897-5465

National Victim Resources

Office for Victims of Crime

www.ovc.gov

800.851.3420

National Center for Victims of Crime

www.ncvc.org

800.394.2225

Identity Theft Center

www.idtheftcenter.org

888-400-5530

Federal Trade Commission

Identity Theft Hotline

www.ftc.gov

877.438.4338

National Center for Missing & Exploited Children

www.missingkids.com

800.843.5678

National Crime Prevention Council

www.ncpc.org

800.627.2911

Bureau of Indian Affairs

Indian Country Child Abuse Hotline

www.doi.gov/bia

800.633.5155

National Organization for Victim Assistance

www.trynova.org

800.879.6682

Federal Bureau of Prisons

Federal Inmate Locator/Information

www.bop.gov

Mothers Against Drunk Driving (MADD)

www.madd.org

800.621.6233

National Consumers League Fraud Center

www.fraud.org

800.876.7060

Annual Credit Report Request Service

www.annualcreditreport.com

National Domestic Violence Hotline

www.ndvh.org

800.799.7233

National Resource Center on Domestic Violence

www.nrcdv.org

800.537.2238

National Sexual Violence Resource Center

www.nsvrc.org

877.739.3895

United States Attorney's Office

1225 17th Street, Suite 700

Denver, Colorado 80202

303-454-0100

1-888-751-4450

Additional Community Resources

MEDICAL

Sky Ridge Medical Center

10101 Ridge Gate Pkwy
Lone Tree, CO 80124
(720) 225-1000

Parker Adventist Hospital

9395 Crown Crest Blvd.
Parker, CO 80138
(303) 269-4000

Dixie Regional Medical Center

515 S. 300 E.
St. George, UT 84770
435-251-1000

- Douglas County Domestic Violence Shelter 720-913-6035 (CO)
- Rape Assistance & Awareness Program 720-489-8177 (CO)
- 24-hour Rape Crisis Hotline 888-421-1100 (National)
- Utah Domestic Violence Hotline 800-897-5465 (UT)
- East Washington County Victim Services 435-635-9663 Ext. 7 (UT)

POLICE

Parker Police Department

18600 Lincoln Meadows Pkwy
Parker, CO 80134
(303) 841-9800

Douglas County Sheriff's Office

4000 Justice Way
Castle Rock, CO. 80138
303-660-7535

Santa Clara-Ivins Police Dept.

2603 Santa Clara Dr.
Santa Clara, UT 84765
435-652-1122

CAMPUS RESOURCES

Colorado

Campus Safety & Security

(24 hours a day, 7 days a week)
720-875-2892

Director of Student Affairs

(8:30 a.m.-4:30 p.m.) 720-875-2821

Counseling Services

720-874-2407

Student Financial Services

720-874-2442

Utah

Campus Safety & Security

(24 hours a day, 7 days a week)
435-222-1300

Student Affairs

(8:30 am– 5:00 pm) 435-222-1270

Mental Health/ Counselor

435-222-1271

Student Financial Services

435-222-1248

On-call Counseling

(After 4:30 p.m. and on weekends). In case of emergency, on-call counselor is available through campus Safety & Security
720-875-2892 (Parker), 435-218-6796 (Ivins)

Title IX Coordinator

Laura Dement
8401 S. Chambers Rd.
Parker, CO 80134
(720) 874-2481

Linc Wellness Hotline

1-888-893-5462
24-hour hotline

Alcohol and Drug Treatment and Counseling Programs

24 Hour National Alcohol and Substance Abuse Information Center
1-800-784-6776

Mental Health & Substance Abuse Treatment Referral Services**Colorado**

Mental Health America:
<http://www.mentalhealthanswers.org>
719-633-4604

The Colorado Center for Clinical Excellence
303-547-3700

Catholic Charities
www.catholiccharitiesdenver.org/
303-742-0828

Centus Counseling Services
303-830-2130
www.charg.org

Utah

Substance abuse &
Mental Health
<https://dsamh.utah.gov/>
800-273-8255

New Roads Treatment
newroadstreatment.org
888-358-8998

Highland Ridge Hospital
www.highlandridgehospital.com

Drug Abuse Information & Treatment

Colorado

Broader Horizons Counseling Services
5524 E Colfax Ave
Denver, CO 80220
(303) 975-6696

Community Alcohol/Drug Rehab
3315 Gilpin Street
Denver, CO 80205
(303) 295-2521

Behavior Services Institute
1725 High Street, Suite 3
Denver, CO 80218
(303) 831-4500

Utah

Utah Addiction Centers
2590 Prairie View Dr.
Eagle Mountain, UT 84005
801-766-2233

Pomarri Drug Rehab/Addiction Center
1472 E. 820 N.
Orem, UT 84097
801-227-1226

Alpine Recovery Lodge
1018 Oakhill Dr.
Apline, UT 84004
877-514-4060

CRIME STATISTICS

Crime statistics for RVU are prepared by the Safety & Security Department. Rocky Vista University compiles its crime statistics using the uniform crime reporting system of the Department of Justice, Federal Bureau of Investigation, including any modifications pursuant to the Hate Crime Statistics Act.

Please note that the University's crime statistics include not only crimes that have been reported to state and local police authorities, but also crimes reported to Campus Security Authorities which may not have been reported to the police (*for example, minor violations of the Student Code of Conduct or crimes where the victim chooses not to press criminal charges*).

The primary source for RVU statistics is reports received by the University's Campus Safety & Security. All crimes involving University students, personnel, and/or property are required to be reported to Campus Safety & Security. Other individuals who have significant responsibilities for student and campus activities are also surveyed. If these individuals disclose any crimes that may not have been reported to Campus Safety & Security, the crimes are also included in the crime statistics.

Finally, the crime statistics include crimes that have occurred in or on non-campus buildings and property owned or controlled by RVU or by an officially recognized student

organization, as well as on public property (*including thoroughfares, streets, sidewalks, and parking locations*) that is adjacent to and accessible from the campus. The University requests information on these crimes from state and/or local police agencies for inclusion in the crime statistics whether or not they were previously reported to Campus Security Authorities.

Under the “CLERY ACT” the Annual Security Report (“ASR”) is in compliance with U.S. Public Law 101-542, The Student Right-To-Know and Campus Security Act. The ASR is published in October of each year. For additional copies, contact Andrew Stevens, Clery Act Coordinator at 720-874-2482 **or visit www.rvu.edu/security**.

CLERY Crimes and Definitions

Criminal homicide: These offenses are separated into two categories: Murder and Non-negligent Manslaughter, and Negligent Manslaughter.

a) Murder and Non-negligent Manslaughter is defined as the willful (non-negligent) killing of one human being by another.

b) Negligent Manslaughter is defined as the killing of another person through gross negligence.

Sex offenses. Sex offenses are separated into two categories: forcible and non-forcible. Include attempted sex offenses, but do not include in your Clery statistical disclosures any sex offenses other than the four types of Forcible Sex Offenses and the two types of Nonforcible Sex Offenses described in this chapter.

a) Sex Offenses—Forcible is defined as any sexual act directed against another person, forcibly and/or against that person’s will; or not forcibly or against the person’s will where the victim is incapable of giving consent.

b) Sex Offenses—Non-forcible is defined as unlawful, non-forcible sexual intercourse

Sex Offense Definitions:

Rape is the carnal knowledge of a person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her youth). This offense includes the forcible rape of both males and females. If force was used or threatened, classify the crime as forcible rape regardless of the age of the victim. If no force or threat of force was used and the victim was under the statutory age of consent, classify the crime as statutory rape. The ability of the victim to give consent must be a professional determination by a law enforcement agency.

Rape as defined in the Uniform Crime Report is 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." As January 1, 2013

Sexual Consent: Sexual activity requires consent, which is defined as positive, unambiguous, and voluntary agreement to engage in specific sexual activity throughout a sexual encounter. Consent cannot be inferred from the absence of a "no"; a clear "yes," verbal or otherwise, is necessary. Consent to some sexual acts does not constitute consent to others, nor does past consent to a given act constitute present or future consent. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Consent cannot be obtained by threat, coercion, or force. Agreement under such circumstances does not constitute consent.

Consent cannot be obtained from someone who is asleep or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other condition. A person is mentally or physically incapacitated when that person lacks the ability to make or act on considered decisions to engage in sexual activity. Engaging in sexual activity with a person whom you know – or reasonably should know – to be incapacitated constitutes sexual misconduct

Sodomy is oral or anal sexual intercourse with 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.

Sexual Assault with an Object is the use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity. An object or instrument is anything used by the offender other than the offender's genitalia. Examples are a finger, bottle, handgun, stick, etc.

Fondling is 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.

There are two types of Non-Forcible Sex Offenses:

- **Incest** is non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape** is non-forcible sexual intercourse with a person who is under the statutory age of consent.

Crime Definitions

Robbery; is 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; is an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm

Burglary; is the unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft; is the theft or attempted theft of a motor vehicle.

Arson is 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.

Larceny-Theft; is 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; is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness

Intimidation; is 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; is 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

Weapons: Carrying, Possessing, Etc., is defined as the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

Drug Abuse Violations; are defined as 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. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

Liquor Law Violations; are defined as the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Domestic violence; includes asserted violent misdemeanor and felony offenses committed by the victim'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 of physical, sexual or emotional abuse or threats to control another person who is, or has been involved in, a sexual, dating, or other intimate relationship with the victim. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.

Stalking; means a 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.

Consent; means *voluntary Acquiescence to the proposal of another; the act or result of reaching an accord; a concurrence of minds; actual willingness that an act or an infringement of an interest shall occur.*

Consent is an act of reason and deliberation. A person who possesses and exercises sufficient mental capacity to make an intelligent decision demonstrates consent by performing an act recommended by another. Consent assumes a physical power to act and a reflective, determined, and unencumbered exertion of these powers. It is an act unaffected by **Fraud**, duress, or sometimes even mistake when these factors are not the reason for the consent. Consent is implied in every agreement.

In the context of rape, submission due to apprehension or terror is not real consent. There must be a choice between resistance and acquiescence. If a woman resists to the point where additional resistance would be futile or until her resistance is forcibly overcome, submission thereafter is not consent.

Hate Crime Definitions

A **hate crime** is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender's bias. **Bias** is a preformed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation or ethnicity/national origin.

Although there are many possible categories of bias, under Clery, only the following six categories are reported:

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, whites).

Gender: a preformed negative opinion or attitude toward a group of persons because those persons are male or female.

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 sexual attraction toward, and responsiveness to, members of their own sex or members of the opposite sex (e.g., gays, lesbians, heterosexuals).

National origin: refers to a person's, or his or her ancestor's, country of birth. It can also refer to the physical, cultural, or linguistic characteristics of a national origin group A preformed negative opinion or attitude toward a group of persons of the same race or

national origin who share common or similar traits, languages, customs and traditions (e.g., Arabs, Hispanics).

Ethnicity: an ethnic quality or affiliation resulting from racial or cultural ties The fact or state of belonging to a social group that has a common national or cultural tradition

Disability: preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments/challenges, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

Gender Identity refers to “one’s sense of oneself as male, female, or transgender” (American Psychological Association, 2006). When one’s gender identity and biological sex are not congruent, the individual may identify as transsexual or as another transgender category.

Definitions of Geographical Area

The Clery Act requires that all institutions disclose statistics for offenses committed in certain geographical locations associated with the University. Example, if a crime is reported to RVUPSS it should be included in the Annual Security Report only if it occurred in the following locations; On- Campus, Non-Campus, or public property within or immediately adjacent to and accessible from the campus.

Campus – (i) 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 residence halls; and (ii) any building or property that is within or reasonably contiguous to the area identified in paragraph (i) of this definition, that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purposes (such as a food or other retail vendor).

Non-Campus - (i) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or (ii) 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 - "Public property" is defined by the Clery Act regulations as all public property including thoroughfares, streets, sidewalks, and parking facilities that are within the campus, or immediately adjacent to and accessible from the campus. Include the sidewalk across the street from the campus, but do not include public property beyond the sidewalk.

Colorado Campus Crime Statistics, 8401 S. Chambers Rd. Parker, CO 80134

Crimes	Year	On Campus	Non Campus	Public Property	Total
Aggravated Assault	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Arson	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Burglary	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	1	0	1
Criminal Homicide: Murder/Non-Negligent manslaughter	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Criminal Homicide: Negligent manslaughter	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Motor Vehicle Theft	2015	0	0	0	0
	2016	0	1	0	1
	2017	0	0	0	0
Robbery	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Sex Offense: rape, fondling, incest, statutory rape	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Sex Offense: Non Forcible Sex Offense	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0

Colorado Campus Crime Statistics, 8401 S. Chambers Rd. Parker, CO 80134

Hate Crimes	Year	On Campus	Non Campus	Public Property	Total
Aggravated Assault	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Arson	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Any Other Crimes involving Bodily Injury	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Burglary	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Criminal Homicide: Murder/Non-Negligent manslaughter	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Criminal Homicide: Negligent manslaughter	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Destruction, Damage, or vandalism of Property	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Intimidation	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0

Colorado Campus Crime Statistics, 8401 S. Chambers Rd. Parker, CO 80134

Larceny/Theft	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Motor Vehicle Theft	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Robbery	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Sex Offense: rape, fondling, incest, statutory rape	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Sex Offense: Non Forcible Sex Offense	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Simple Assault	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0

Colorado Campus Crime Statistics, 8401 S. Chambers Rd. Parker, CO 80134

Liquor, Drug & Weapons	Year	On Campus	Non Campus	Public Property	Total
Liquor Law Arrest	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Liquor Law Disciplinary Referrals	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Drug Violation Arrest	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Drug Violations Disciplinary Referrals	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Illegal Weapons Arrest	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Illegal Weapons Disciplinary	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Domestic Violence	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Dating Violence	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Stalking	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0

Colorado Campus Crime Statistics, 8401 S. Chambers Rd. Parker, CO 80134

Hate Crimes	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0
Unfounded Crimes	2015	0	0	0	0
	2016	0	0	0	0
	2017	0	0	0	0

No hate crimes were reported in 2015, 2016, or 2017 based on race, gender identity, religion, ethnicity/national origin, sexual orientation or disability.

*There are five **non-campus properties** that are included in the Clery Crime and Fire Stats, they are: 646 South 1550 East, Spanish Fork, Utah 84660; 531 South, 1840 West, Cedar City, Utah 84720; 1522 Sunset, Liberal, Kansas 67901; 10099 RidgeGate Parkway, Suite 120, Lone Tree, CO, 80124; and #2 Rio Blanco County Road 121, Meeker, CO 81641.*

Utah Campus Crime Statistics, 255 E. Center St., Ivins, UT 84738

Crimes	Year	On Campus	Non Campus	Public Property	Residential Housing	Total
Aggravated Assault						
	2017	0	0	0	0	0
Arson						
	2017	0	0	0	0	0
Burglary						
	2017	0	0	0	0	0
Criminal Homicide: Murder/Non-Negligent manslaughter						
	2017	0	0	0	0	0
Criminal Homicide: Negligent manslaughter						
	2017	0	0	0	0	0
Motor Vehicle Theft						
	2017	0	0	0	0	0
Robbery						
	2017	0	0	0	0	0
Sex Offense: rape, fondling, incest, statutory rape						
	2017	0	0	0	0	0
Sex Offense: Non Forcible Sex Offense						
	2017	0	0	0	0	0

Utah Campus Crime Statistics, 255 E. Center St., Ivins, UT 84738

Hate Crimes	Year	On Campus	Non Campus	Public Property	Residential Housing	Total
Aggravated Assault						
	2017	0	0	0	0	0
Arson						
	2017	0	0	0	0	0
Any Other Crimes involving Bodily Injury						
	2017	0	0	0	0	0
Burglary						
	2017	0	0	0	0	0
Criminal Homicide: Murder/Non-Negligent manslaughter						
	2017	0	0	0	0	0
Criminal Homicide: Negligent manslaughter						
	2017	0	0	0	0	0
Destruction, Damage, or vandalism of Property						
	2017	0	0	0	0	0
Intimidation					0	0
	2017	0	0	0		

Utah Campus Crime Statistics, 255 E. Center St., Ivins, UT 84738

Larceny/Theft						
	2017	0	0	0	0	0
Motor Vehicle Theft						
	2017	0	0	0	0	0
Robbery						
	2017	0	0	0	0	0
Sex Offense: rape, fondling, incest, statutory rape						
	2017	0	0	0	0	0
Sex Offense: Non Forcible Sex Offense						
	2017	0	0	0	0	0
Simple Assault						
	2017	0	0	0	0	0

Utah Campus Crime Statistics, 255 E. Center St., Ivins, UT 84738

Liquor, Drug & Weapons	Year	On Campus	Non Campus	Public Property	Residential Housing	Total
Liquor Law Arrest						
	2017	0	0	0	0	0
Liquor Law Disciplinary Referrals						
	2017	0	0	0	0	0
Drug Violation Arrest						
	2017	0	0	0	0	0
Drug Violations Disciplinary Referrals						
	2017	0	0	0	0	0
Illegal Weapons Arrest						
	2017	0	0	0	0	0
Illegal Weapons Disciplinary						
	2017	0	0	0	0	0
Domestic Violence						
	2017	0	0	0	0	0
Dating Violence						
	2017	0	0	0	0	0
Stalking						
	2017	0	0	0	0	0

Utah Campus Crime Statistics, 255 E. Center St., Ivins, UT 84738

Hate Crimes						
	2017	0	0	0	0	0
Unfounded Crimes						
	2017	0	0	0	0	0

No hate crimes were reported in 2017 based on race, gender identity, religion, ethnicity/national origin, sexual orientation or disability.

*There are five **non-campus properties** that are included in the Clery Crime and Fire Stats, they are: 646 South 1550 East, Spanish Fork, Utah 84660; 531 South, 1840 West, Cedar City, Utah 84720; 1522 Sunset, Liberal, Kansas 67901; 10099 RidgeGate Parkway, Suite 120, Lone Tree, CO, 80124; and #2 Rio Blanco County Road 121, Meeker, CO 81641.*

Daily Crime Logs

The University maintains and makes available a Daily Crime Log on both campuses. A hard copy is available in the Security Office at any time, with the most recent 60 days of activity/crime. For activity/crime information dating past 60 days, a log will be made available within two (2) business days of the request.

EMERGENCY PROCEDURES QUICK REFERENCE

Colorado

911 (911 from University phones)

Campus Safety & Security: 720-875-2892

Maintenance/Facilities: 720-875-2434

Anonymous Help/Tip Line: 303-708-8185

Utah

911 (911 from University Phones)

Campus Safety & Security: 435-222-1300

Maintenance/Facilities: 435-222-1260

Anonymous Help/Tip Line: 435-222-1313

WHAT TO DO IN CASE OF:

Fires

- Call 911 and Campus Safety & Security: 720-875-2892 (**Colorado**), 435-222-1300 (**Utah**).
- Notify other building occupants.
- Help those needing assistance to leave the area.
- Confine the fire by closing doors as you exit.
- Evacuate the building at the nearest exit.
- Go to your rally point and stay with your class.
- **DO NOT** re-enter the building until authorized by emergency personnel.

Building Evacuation Procedures

- When the fire alarm is activated, evacuation is **MANDATORY**.
- Do not use elevators.
- Take personal belongings w/with you.
- Close doors as you exit.
- Move away from the building to your rally point or a safe area.

Shelter-in-Place

- Suspend all activities.
- Proceed immediately to an interior room or if available, a designated shelter-in place location for the building.
- Do not use elevators.
- Close all windows and doors.
- Remain calm.
- Stay in the shelter area until otherwise instructed by university personnel or the authorities.

Active Shooter/Lockdown

- If possible, exit the building and call 911 and Campus Safety & Security at 720-875-2892 (**Colorado**), 435-222-1300 (**Utah**).
- If you cannot exit, clear the hallway immediately and/or remain behind closed doors in a locked or barricaded room.
- Stay away from windows and lock them if possible.
- Shut off lights and close blinds and shades.
- Remain calm and quietly call 911 and Campus Safety & Security at 720-875-2892 (**Colorado**), 435-222-1300 (**Utah**).

- Leave the room only when authorities have arrived and instructed you to do so.
- Do not leave or unlock the door to see what is happening.
- Do not attempt to confront the hostile intruder unless as a last resort.
- Do not assume someone else has called 911 or Campus Safety & Security.

Suspicious Behavior/Persons of Concern

- Do not physically confront the person.
- Do not let anyone into a locked room or building.
- Do not block a person's access to an exit.
- Call Campus Safety & Security at 720-875-2892 **(Colorado)**, 435-222-1300 **(Utah)**.

Suspicious Packages

- Do not touch or disturb the object or package.
- Evacuate the area immediately.
- Call Campus Safety & Security at 720-875-2892 **(Colorado)**, 435-222-1300 **(Utah)**.
- Notify your professor or other University Administrator.

MEDICAL

Cardiac Arrest or Heart Attack

- Assess the scene for danger.
- Check the victim.
- Call or instruct someone to call 911 and Campus Safety & Security at 720-875-2892 **(Colorado)**, 435-222-1300 **(Utah)**.
- Locate an Automatic External Defibrillator (*AED*).
- Perform CPR if trained and willing to do so.

Bleeding

- Apply firm but gentle pressure to the wound with a clean cloth or tissue.
- Have the person lie down.
- Call 911 and Campus Safety & Security at 720-875-2892 **(Colorado)**, 435-222-1300 **(Utah)**.

Burns

- Remove the cause use of the burn.
- Flush the area with water.
- Do not apply a dressing, creams or lotions.

- Call 911 and Campus Safety & Security at 720-875-2892 (**Colorado**), 435-222-1300 (**Utah**).

Hazardous Materials Spills

If the incident is indoors, close all doors in order to isolate the area, if it is safe to do so.

- From a safe area call Campus Safety & Security.
- Be prepared to provide the following information: Name and quantity of the material.
- Time and location of the incident.
- If anyone is injured or exposed to the material.
- If fire or explosion is involved.
- Your name, phone number and location.
- Evacuate if necessary.

Bomb Threats

- Remain calm.
- Get as much information as possible.

Gas Leaks, Fumes & Vapors If

you smell natural gas:

- Do not touch light switches or electrical equipment.
- Go to a safe place and call Campus Safety & Security.
- Clear the area immediately if instructed to do so.
- Provide your name, phone number and location along with the location of the odor.
- Provide as many details as possible.

Flooding

Flooding can occur due to major rainstorms, water main breaks or loss of power to sump pumps. In case of imminent or actual flooding:

- If you can do so safely.
- Secure vital equipment records and hazardous materials.
- Shut off non-essential electrical equipment.
- Move all people to a safe area away from the building in danger.
- Call Campus Safety & Security.
- Do not return to the building until instructed to do so by Campus Safety & Security or Facilities.

Media Inquiries

Direct ALL media inquiries to The President, Dr. Clinton Adams or Deans, Dr. Thomas Told (Colorado) or Dr. David Park (Utah).

ANNUAL FIRE SAFETY REPORT

All fires are to be reported to the ranking Campus Safety & Security Officer or to one of the following administrators on campus (*these RVU employees and their designees also have primary responsibility for determining whether there is an emergency requiring a notification and/or carrying out the notification process*):

- The Director of Campus Safety & Security or his/her designee.
- The campus President.
- The campus Vice President/Dean of Students.

Campus Safety & Security Contact Information:

Parker Campus- 720-875-2892 (Colorado), 435-222-1300 (Utah)

Fire Logs & Statistics

A fire log with the nature, date, time, and location of any fire that occurred in an on-campus building for the most recent 60-day period is available for review during normal business hours at Campus Safety & Security office located on the 1st floor room 1256 (Ivins Campus). Requests for fire log information dated prior to the 60-day time period will be provided upon request.

Fire Statistics

Fires in Residential Facilities – 2015

RVU Colorado Campus has no on campus Residential Housing

Fires in Residential Facilities - 2016

RVU Colorado Campus has no on campus Residential Housing

Fires in Residential Facilities - 2017

RVU has campus Residential Housing on the Utah Campus only.

Utah Campus Fire Statistics 2017:

Residential Housing Facility	Address	Total # of Fires	Cause of Fire	Injuries Requiring Treatment	Deaths Related to Fire	Value of Property Damage
Building A	95 N., 400 E. Ivins, UT 84738	0	0	0	0	0
Building B	95 N., 400 E. Ivins, UT 84738	0	0	0	0	0
Building C	95 N., 400 E. Ivins, UT 84738	0	0	0	0	0

FIRE SAFETY EQUIPMENT

Both campuses have complete pressurized fire sprinkler systems with audible overhead alarms, and strobes, and all buildings have manual fire extinguishers, and evacuation placards in place. The Colorado campus also has a Public Address system and the Fire alarm monitoring is done by Metro State Fire, and Protected by South Metro Fire Department. The main Utah campus and residential housing units' fire alarm system is monitored by Mountain Alarm, and protected by the Santa Clara-Ivins Fire Department. An additional University controlled on-campus facility, known as the Medical Offices Building (MOB), is monitored by Next Alarm and protected by the Santa Clara-Ivins Fire Department as well.

FIRE DRILLS AND FIRE EQUIPMENT— CALENDAR YEAR 2015

One unannounced fire drill was completed for the Colorado campus for the reporting year. 12 monthly safety audits were completed and all fire equipment has passed inspection.

FIRE DRILLS AND FIRE EQUIPMENT— CALENDAR YEAR 2016

One unannounced fire drill was completed for the Colorado campus for the reporting year. 12 monthly safety audits were completed and all fire equipment has passed inspection.

FIRE DRILLS AND FIRE EQUIPMENT— CALENDAR YEAR 2017

One unannounced fire drill was completed for each the Colorado and Utah campus' for the reporting year. 12 monthly safety audits were completed and all fire equipment has passed inspection for the Colorado campus in 2017. One unannounced fire drill was conducted at the Utah Campus and six (6) monthly safety audits* were completed and all fire equipment passed inspection in 2017.

* The Utah campus did not receive its certificate of occupancy until June of 2017, and the inaugural class did not matriculate until July of 2017.

FIRE EMERGENCY PROCEDURES

Effective emergency response requires the coordinated efforts of staff, faculty, and students. Each member of the RVU community should be prepared to act promptly when faced with an emergency. This includes knowing the following:

- Evacuation routes, exit points and rally points; where rally point leaders, or their designee(s), will attempt to take an accounting (roll call) of employees, students, guests and visitors, after evacuation.
- When and how to evacuate a building.
- Locations of emergency supplies and materials, such as fire extinguishers, pull alarms and first aid kits.
- Proper procedures for notifying emergency responders about an emergency in your building or work area.
- Potential exposures to hazardous materials or processes in and around your work area, as well as any means of protecting yourself in the event of an emergency.
- Proper procedures for location specific emergencies (i.e. snowstorm, hurricane, ice storm, etc.).
- Campus emergency contact phone numbers.

EMERGENCY EVACUATIONS

In the event of evacuation, campus procedures shall be followed as closely as possible. Evacuations may be the correct course of action in some instances, and direction in these cases will be provided by the incident commander, his/her designee and/or a local emergency services agency.

If the decision is made to evacuate one or more university buildings:

- Stay calm, do not rush, and do not panic.
- Safely stop your work if time permits and it is safe to do so.

- Gather your personal belongings (**Reminder:** take prescription medications out with you if at all possible).
- No one shall remain in the building, no one shall re-enter the building without the authorization of the incident commander or the responding emergency services agency.
- Upon exiting the building, students, faculty, and staff should report to the designated rally point. See the table(s) in the appropriate campus plan for the list of evacuation procedures and rally point locations.
- Once at the rally point, students, faculty and staff shall remain at the rally point unless otherwise directed by University or emergency response personnel. Students, staff and faculty **MUST** check in with their rally point leader or building manager to attempt to provide an account of occupants to the incident commander. The incident commander must be notified if students, staff and/or faculty have not successfully evacuated or are missing.

Evacuation Procedures for People with Disabilities

- Evacuate people with disabilities if possible.
- **DO NOT** use elevators, unless authorized to do so by police or fire personnel.
- If the situation is life threatening, call 911.
- Check on people with special needs during an evacuation. A "buddy system" where people with disabilities arrange for volunteers, alert them and assist them in an emergency, is a good method.
- Attempt a rescue evacuation **ONLY** if you have had rescue training or the person is in immediate danger and cannot wait for professional assistance.
- Always ask someone with a disability how you can help **BEFORE** attempting any rescue technique or giving assistance. Ask how he or she can best be assisted or moved, and whether there are any special considerations that need to come with that person.
- Evacuate to fire stairwells.

FIRE SAFETY INFORMATION FOR STUDENTS

Fire Safety Rules

Building fire exits and fire escapes are to be used in the event of actual emergency conditions and must be kept clear of obstacles and impediments at all times. Fire escapes are off limits except during emergencies. Violators are subject to fines and disciplinary action.

Fire alarms and extinguishers are placed in all buildings for your safety and that of other occupants. You are reminded that use of the equipment, except in the case of fire, jeopardizes the safety of all occupants, subjects the violator, to fines and disciplinary action (up to and including dismissal from the University) and constitutes a serious criminal offense under the laws of the both states.

You must exit the building whenever a fire alarm sounds, during routine fire drills and when illegal or unauthorized use of this equipment has occurred. Fire drills are conducted periodically and may or may not be announced.

Fire/Explosion Evacuation Procedures

- The person who discovers a fire should notify Campus Safety & Security or call 911 and leave the immediate area.
- All building occupants should evacuate the building via the nearest safe exit upon sounding of the fire alarm. If the primary route is blocked by fire, the secondary route should be used.
- **DO NOT RUN.**
- **DO NOT** use elevators for evacuation.
- Once outside, occupants should proceed to their building's designated rally point.
- The highest-ranking Campus Safety & Security staff member at the site shall attempt to account for all occupants. Professors and supervisors shall notify Campus Safety & Security of any missing persons. Campus Safety & Security will report any, missing occupants to the fire department.
- The student/employee who discovers the situation and begins the evacuation shall contact Campus Safety & Security (at the rally point) to give the location and type of fire (oil, paper, etc.). As a back-up, once Campus Safety & Security is contacted, they will notify the fire department of the alarm situation.
- Upon fire department arrival, the highest ranking Campus Safety & Security employee and the student/employee who discovered the fire shall report the location and type of fire and any missing occupants.
- Campus Safety & Security (or the incident commander) shall contact an ambulance and hospital if students/employees are injured.
- The fire department will notify Campus Safety & Security when it is safe to re-enter the building. Campus Safety & Security will then inform Safety Wardens, employees and students of their decision.

University Safety Stewards

Both the Colorado and Utah campuses have assigned safety stewards to assist Campus Safety and Security in the event of a fire or evacuation procedure. All stewards are trained on an annual basis and have each been issued a designated safety vest for identification.

TRAINING & EXERCISES

Training and exercises are an integral part of the university's emergency response program. The level and type of training received by each individual will vary according to that individual's responsibilities within the program. The training shall be developed and provided by the appropriate departments or external agencies.

It is the responsibility of each (building) occupant to become familiar with general evacuation procedures, and to know the evacuation routes and assembly areas that are listed in the emergency plan. Faculty and staff shall also attend training(s) given by their department leads on an annual basis.

Conducting drills is essential for assessing emergency plans and procedures, for determining the readiness of emergency responders for resolving questions of coordination and clarifying roles and responsibilities, and for promoting awareness of potential hazards. In addition to drills, tabletop exercises shall be conducted periodically with various response team members as a less involved technique for evaluating specific aspects of the emergency' response program. These exercises will be developed and coordinated by the Crisis Management Team and will seek to include external community members and government emergency service providers.

Whenever feasible, observers from within RVU and from outside agencies should be present throughout the drill to analyze and evaluate each component of the response, and to make recommendations as needed.

Maintenance of the University Emergency Response and Communication Plan

The University Emergency Response and Communication Plan will be subject to ongoing changes (and improvements) based on the results of actual events, post-exercise drills and activities, and input from units and departments tasked in the plan. There shall be an annual review process; however incremental changes, modifications and adjustments to the plan will be made as conditions change. The Emergency Operations Team shall be responsible for documenting the training of staff and for retaining that documentation.

STUDENT HANDBOOK POLICIES AND RULES

As stated in the Student Handbook, the following items are not allowed within our campuses building due to existing RVU policy, fire safety laws, and federal, state and local laws.

Your cooperation is expected and appreciated. Possession of any of the following items may result in seizure and/or destruction of the items by a University representative and may result in student conduct action.

- Alcoholic beverages and containers- without approval from the President or Dean of Students.
- Narcotics, drugs and drug-related items.
- Firearms, weapons, ammunition and related paraphernalia, BB guns and air guns.
- Explosive materials.
- Realistic replicas of firearms or other weapons.
- Gasoline, kerosene and other fuels. (Other than those stored and used by Facilities management)
- Firecrackers and fireworks.
- Combustible decorations.
- Candles, lanterns, incense, etc. (No open flames).
- Chemicals of any kind. (Other than those used and stored by RVU)
- Additional furniture (without prior approval).
- Cooking equipment (i.e., grills, toaster ovens, hot pots, hot plates, fry pans, etc. without prior approval).
- Immersion heaters.
- Dangerous Pets (including fish and reptiles).
- Items that may affect the safety or security of the University.

Student Code of Conduct

Conduct that violates the Student Code of Conduct includes (but is not limited to):

- Harming or endangering yourself or others.
- Use of, or threatened use of, physical force or violence.
- Fighting.
- Endangering the health or safety of oneself or another person.
- Threatening or attempting suicide.
- Intentional possession of a dangerous article or substance which may be used to injure or cause discomfort to any person.

- Possession or use of firearms or other weapons, ammunition, BB guns, air guns, fireworks, incendiary devices, or explosives.
- Initiating or circulating a report or warning of an impending bombing, fire, or other crime, emergency or catastrophe, knowing that the report is false.
- Arson or intentionally or recklessly starting a fire on University property.
- Misuse of or tampering with fire safety equipment (e.g. fire extinguishers, smoke detectors, exit signs, and pull stations).
- Participating in hazing or any other action or situation which endangers an individual's mental or physical health and/or involves the forced consumption of alcohol or drugs.
- Aiding, abetting, encouraging, or participating in a riot, commotion, or disturbance, or other disorderly conduct.
- Failure to evacuate any building in which a fire or other emergency alarm has been sounded or when directed to evacuate by a university representative.

If you are found responsible for injuring or intending to injure another person, you will, at a minimum, be suspended from the University.

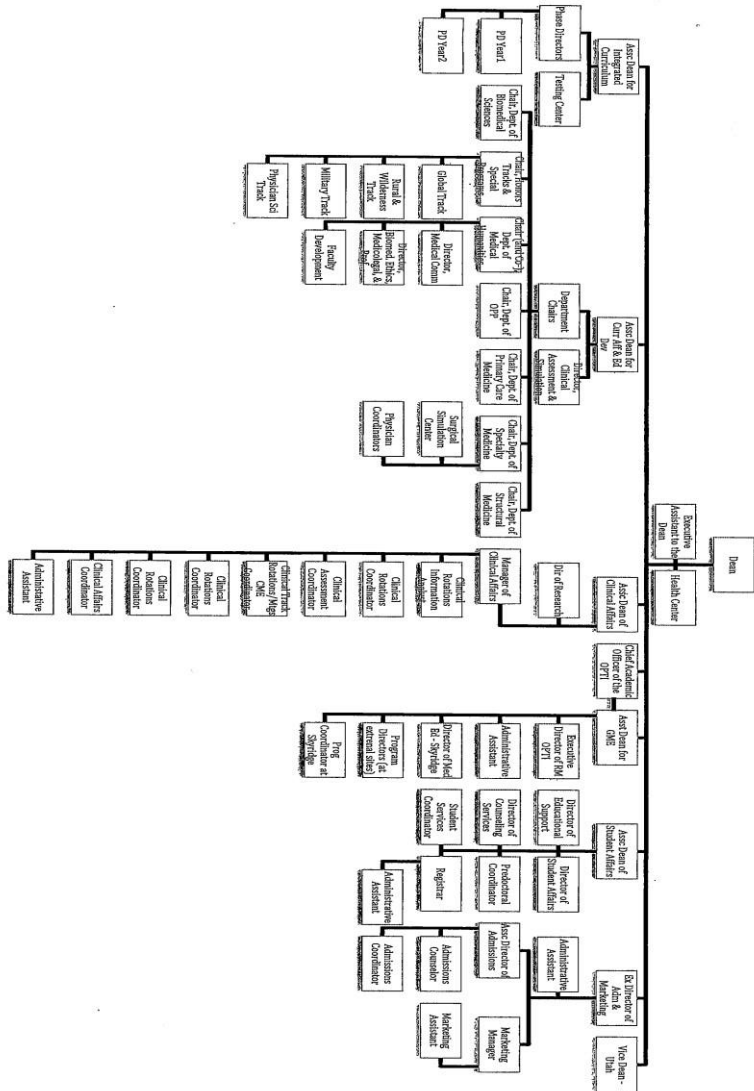
If you are found responsible for misuse or tampering with fire safety equipment, you will, at a minimum, be suspended from the University.

SMOKING POLICY

Smoking is strictly prohibited in all campus facilities. This includes, but is not limited to, common work areas, classrooms, conference and meeting rooms, private offices, elevators, hallways, residence halls, stairs, restrooms, vehicles and parking areas and all other campus facilities or locations.

NOTICE OF NONDISCRIMINATION

It is the policy of Rocky Vista University and all of its affiliated colleges and organizations not to engage in discrimination or harassment against any person because of race, color, religion or creed, sex, pregnancy, national or ethnic origin, non-disqualifying disability, age, ancestry, marital status, sexual orientation, unfavorable discharge from the military, veteran status, political beliefs or affiliations, and to comply with all federal and state nondiscrimination, equal opportunity and affirmative action laws, orders and regulations, including remaining compliant and consistent with the Civil Rights Act; the Americans with Disabilities Act; the Rehabilitation Act of 1973; and Title IX of the Education Amendments of 1972. This policy on non-discrimination applies to admissions, enrollment, scholarships, loan programs, participation in University activities, employment and access to, participation in and treatment in all University centers, programs and activities.



NOTE: Director of the Library will be moved under the President's Office.


ROCKY VISTA UNIVERSITY Campus Map


Parker, CO Campus



Parker, CO Campus

Rocky Vista University
8401 S Chambers Rd.
Parker, Co. 80134

 Red is on Campus Boundries

 Yellow is Off Campus Boundries



Colorado Campus Exterior Evacuation Point



Rocky Vista University
255 E. Center St.
Ivins, UT 84738

Ivins, UT Campus
Red line = On Campus Boundary



Utah Campus Evacuation Points



Utah Campus



Link to Published [Document](#) of RVU website

EMERGENCY RESPONSE AND EVACUATION PLAN

The basic Emergency Response Plan outlined is to protect lives and property through effective use of campus community resources. Whenever a situation or an emergency affecting the campus reaches proportions that cannot be handled by routine procedures, the Emergency Response Plan shall be implemented.

Assessment of Need for an Emergency Response Plan

An educational institution, like any other governmental unit, has certain basic responsibilities to its constituents. Among these is providing for responses to events that are beyond the normal scope of everyday business. Because of the necessity to provide responses to emergencies, this manual has been created. It is subject to change and is a "living document." It is not intended to cover every possible circumstance or event, but to guide the College in its responses.

- In any emergency, the first step is to take care of yourself.
- Employees should inform others about weather-safe zones and emergency exits.
- Persons with disabilities who need assistance during an emergency should arrange for assistance with volunteers from their classes or offices.
- Persons with disabilities may request an appointment to review emergency evacuation procedures with the security department.
- Areas of rescue assistance are located in the south and north stairwells.

Evacuation Procedure

If the fire alarm sounds, evacuate the building. Move quickly in an orderly fashion to the nearest exit and continue to the furthest part of the lower south parking lot (student parking lot).

- Do not use the elevators.
- Keep clear of emergency vehicles.
- Stay with the group from your area or with your class.
- Stay out of the building until you hear the "ALL CLEAR" from the fire, police or security personnel.
- Floor marshals wearing vests are available to direct you.
- Building floor maps are posted by all entrances.

Shelter-In-Place Procedure

If notified via PA system, bull horn, email, text message, in person, or your own observations to shelter-in-place, you should:

- Put distance between you and the danger.
- Get into a room and lock the door if possible, or meet on the first floor hallway between the large auditorium and the seminar rooms.
- Stay in the room until you hear "All Clear" form someone in authority.
- Ignore the fire alarm in a shelter-in-place situation.
- An evacuation notice will follow if that is the course of action to take.

- Staging areas is the furthest part of the south parking lot.
- Be prepared to move further away if instructed or if needed.

Emergency Notification

The Security Department, taking into account the safety of the community, determines the content and scope of the notification and initiates the notification system unless the notification will, in the professional judgment of responsible authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency. The College will provide adequate follow up information to keep the college community informed.

Alert Campus Community

Rocky Vista University, through the Director of Security or his designee will, without delay, notify the campus community upon the confirmation of a significant emergency or dangerous situation. The Security Department makes emergency notifications via:

- Fire alarm and/or public address system
- Email to staff and students
- Bull horn
- TV monitors, website, electronic reader board
- Radio and television stations

Testing the Emergency Response and Evacuation Plan

The emergency response plan, evacuation plan and its components are tested, trained, and evaluated on a monthly basis. The testing/training may include, but is not limited to, the following:

- Announced and unannounced drills
- Tabletop exercises
- Simulated interactive exercise
- Full-scale exercise
- Testing the emergency notification systems
- Training of floor marshals
- Active shooter drills
- Safety presentations at staff meetings

Each testing will be assessed, evaluated, and documented as to the nature, date, time, and whether the test was announced or unannounced. This documentation will be the responsibility of the Director of Security and will be retained by the Security Department for at least seven years. In addition, an evaluation of the drill or exercise will be published to the campus community via email or the website.

Definition of Emergency Situations

Situations occur daily that require attention of College personnel to ensure a safe campus. Four levels of concern have been delineated to clarify how personnel will respond.

Level 1 - Minor Situation (will not require Command Center) includes any incident, potential or actual, which will not seriously affect the overall function of the College and can be handled by routine procedures.

- Minor natural problem (snow alert or delay, temporary electrical outage)
- Minor altercation/violations of Code of Conduct
- Minor accidents (first aid)
- Medical Assistance - NOT urgent (individual(s) whose treatment or transportation is not urgent and can be delayed temporarily)
- Few persons involved (1-3)

Level 2 - Minor Emergency (may require Command Center) includes any incident, potential or actual, which will not seriously affect the overall function of the College and cannot be handled by routine procedures.

- Exceeds Level 1 definitions
- Moderate crisis
- Moderate natural problem, but widespread and extended in terms of time
- Snow closure
- First Aid necessary
- Moderate accident (individual(s) whose treatment or transportation is not urgent and can be delayed)
- Minor to moderate injuries that may need ambulance transport
- Many people affected (4-50)
- Breach of computer security

Level 3 - Major Emergency (may require field Command Center) includes any incident, potential or actual, which affects the entire building(s) and which will disrupt the overall function/operations of the College. Outside emergency services will probably be required.

- Life and limb threatened by natural disasters, utility failures, crimes of violence, criminal behavior, HAZ-MAT crisis
- Large-scale problems affecting College as a whole
- Individual(s) needing medical transport
- Multiple injuries

Level 4 - Disaster (may require Command Center) includes any event or occurrence that has seriously impaired or halted the operations of the College. In some cases, casualties or severe property damage may be sustained. Outside emergency services will be required.

- Catastrophic damage
- Major danger to people on-site
- Loss of life
- Natural disasters, explosions
- Crimes of violence

- Criminal behavior
- HAZ-MAT crisis

Emergency Response Teams

There are three primary teams that may be activated in emergency situations depending on the level of the situation, namely: the Emergency Response Plan Management Team, the Critical Incident Response Team, and the Communication Team.



Exposure Control Plan

POLICY

Rocky Vista University (RVU) is committed to providing a safe and healthful work environment for all our staff and students. In pursuit of this goal, the following Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA Standard 29 CFR 1910.01030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist RVU in implementing and ensuring compliance with the standard, thereby protecting our employees and students. This ECP includes:

- Determination of employee and student exposure
- Implementation of various methods of exposure control, including:
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluations and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Implementation Methods for these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

- The Compliance Office is responsible for the implementation of this ECP. The Office will maintain, review and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

- Compliance and Quality Assurance Specialist: Laura Dement
- Contact: 720-874-2481
- Those employees and students who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.
- The ECP Administrators will provide and maintain all necessary personal protective equipment (PPE), engineering controls, labels and red bags in the Health Center as required by the standard. The ECP Administrator will ensure that adequate supplies of the aforementioned equipment are available in appropriate sizes.
 - ECP Administrator, Colorado Campus: Dr. Joseph Stasio
 - Contact: 720-875-2816
 - ECP Administrator, Utah Campus: Dr. Ben Wilde
 - Contact: 435-222-1283
- The Manager of Human Resources will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate health and OSHA records are maintained.
 - Manager of Human Resources: Patty Gordon
 - Contact: 720-875-2458
- The Compliance and Quality Assurance Specialist will be responsible for OSHA/HIPAA training, documentation of training and making the written ECP available to employees and students, OSHA and NIOSH representatives.
 - Laura Dement
 - Contact: 720-874-2871

EMPLOYEE EXPOSURE DETERMINATION FOR TRAINING

The following is a list of all job types at RVU in which employees have occupational exposure:

<u>Classification</u>	<u>Training Schedule</u>	<u>Method</u>
<i>Medical Students</i> <ul style="list-style-type: none"> ● 1st Year ● 2nd Year ● 3rd Year ● 4th Year 	<ul style="list-style-type: none"> ● Annual ● Annual ● Annual ● Annual 	<ul style="list-style-type: none"> ● Live presentation during orientation ● Live presentation or online CITI training prior to shadowing ● Live presentation or online CITI training prior to rotations ● Live presentation or online CITI training prior to rotations

All employees whose official job description or contract includes any time in a clinical setting.	Annual; prior to starting clinical duties	Live presentation or online CITI training
<u>Classification</u>	<u>Training Schedule</u>	<u>Method</u>
All employees whose official job description or contract includes any time in the Anatomy Lab.	Annual; prior to starting duties in the Anatomy Lab	Live presentation or online CITI training
Any employee whose official job description or contract includes duties with potential exposure to human blood or other potentially infectious materials.	Annual	Live presentation or online CITI training
All other employees	Not Required	

- In addition, all employees who may be at risk of exposure to bloodborne pathogens (OPIM) shall be offered a Hepatitis Vaccine series free of charge at the time of employment.

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions: All employees and students will utilize Universal Precautions at all times. All patients must be regarded as potentially infected with blood-borne pathogens.

- All workers should routinely use appropriate barrier precautions to prevent skin and mucous membrane exposure when contact with blood or other body fluids is anticipated. Gloves should be worn for touching blood and body fluids, mucous membranes, or non-intact skin of all patients, for handling items or surfaces soiled with blood or body fluids, and for performing venipuncture and other vascular access procedures. Gloves should be changed after contact with each patient.
- Masks and protective eyewear or face shields should be worn during procedures that are likely to generate droplets of blood or other body fluids to prevent exposure of mucous membranes of the mouth, nose, and eyes. Gowns or aprons should be worn during procedures that are likely to generate splashes of blood or other body fluids.
- Hands and other skin surfaces should be washed immediately and thoroughly if contaminated with blood or other body fluids. Hands should be washed immediately after gloves are removed.
- All health-care workers should take precautions to prevent injuries caused by needles, scalpels, and other sharp instruments or devices during procedures; when cleaning used instruments; during disposal of used needles; and when handling sharp instruments after procedures. To

prevent needle stick injuries, needles should not be recapped, purposely bent or broken by hand, removed from disposable syringes, or otherwise manipulated by hand. After sharps are used, they should be placed in puncture-resistant containers for disposal; the puncture-resistant containers should be located as close as practical to the use area.

- Pregnant health-care workers are not known to be at greater risk of contracting HIV infection than health-care workers who are not pregnant; however, if a health-care worker develops HIV infection during pregnancy, the infant is at risk of infection resulting from perinatal transmission. Because of this risk, pregnant health-care workers should be especially familiar with and strictly adhere to precautions to minimize the risk of HIV transmission.

Exposure Control Plan: Employees and students covered by the bloodborne pathogens standards receive an explanation of this ECP during their initial training. It will also be reviewed in their annual refresher training. All employees and students can review this plan at any time by contacting the Office of Compliance and Quality Assurance.

The Compliance and Quality Assurance Specialist is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised positions with occupational exposure.

Engineering Controls and Work Practices: Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

- Hand-washing facilities are readily available
- Antiseptic hand cleanser is available throughout the campus
- Contaminated needles and other sharps shall not be recapped, bent or broken
- Puncture-resistant, leak-proof sharps containers are conveniently located
- Never reach into a sharps container
- Eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in work areas is strictly prohibited
- Food and drinks must never be stored where potentially contaminated materials are stored
- All procedures must be done in such a way as to minimize splashing, spraying and spattering
- Mouth pipetting/suctioning of blood or other potentially infectious materials is prohibited
- All containers for storage, transport, shipping or disposal must be clearly labeled

Sharps disposal containers are inspected and maintained or replaced by the Practice Director in the Health Clinic, and the Chair of Primary Care Medicine in University labs every 2 months, or more whenever necessary to prevent overfilling.

RVU identifies the need for changes in engineering controls and work practices through an annual review of OSHA records and employee interviews. RVU evaluates new products regularly by researching new and innovative engineering controls and work practices. Both front-line workers and management officials are involved in this process by participating in OSHA review committees. The Compliance and Quality Assurance Specialist is responsible for ensuring that these recommendations are implemented.

Personal Protective Equipment (PPE): PPE is provided to employees at no cost to them. Students are required to supply their own PPE for use on campus; during off-site clinical education, PPE will be

provided by the clinical training site. Training in the use of the appropriate PPE for specific tasks or procedures is provided by the Practice Director in the Health Clinic and by the Chair of Primary Care Medicine at the University.

The types of PPE available to employees are as follows:

- Gloves (all sizes)
- Eye goggles
- Face masks

All employees and students using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE may be disposed of in appropriate containers.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
- Utility gloves may be decontaminated for reuse if their integrity is not compromised. Discard utility gloves if they show signs of cracking, peeling, tearing, puncturing or deterioration.
- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters or droplets of blood or OPIM pose a hazard to the eye, nose or mouth.
- Remove immediately or as soon as feasible any garment contaminated by blood or OPIM in such a way as to avoid contact with the outer surface.

Housekeeping: Regulated waste is placed in containers that are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is:

- Container is properly sealed
- Placed in biohazard transport container
- Off-site contractor picks up as needed

The procedure for handling other regulated waste is:

- Container is properly sealed
- Placed in biohazard transport container
- Off-site contractor picks up as needed

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available in the Anatomy Lab and the Health Center.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a broom and dustpan.

Laundry: RVU does not produce, nor does it launder any contaminated articles.

Labels: The following labeling methods are used in this facility:

- Red bags
- Bio-hazard stickers
- Properly labeled with RVU's name and address

The Practice Director in the Health Clinic and the Chair of Primary Care Medicine at the University are responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify the Practice Director if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipments, etc., without proper labels.

HEPATITIS B VACCINATION

The Compliance and Quality Assurance Specialist will provide training to employees and students on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available free of charge for employees in the RVU Health Clinic after initial employee training and within ten days of initial assignment for employees identified in the exposure determination section of this plan. Vaccination is encouraged unless: 1) documentation exists that the employee has previously received the series; 2) antibody testing reveals that the employee is immune; or 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at their own cost. Documentation of refusal of the vaccination is kept in the Compliance Office.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact:

- Patty Gordon, Manager of Human Resources: 720-875-2400.
- Laura Dement, Compliance and Quality Assurance: 720-874-2481

An immediately available confidential medical evaluation and follow-up will be conducted by the Health Center, or by the workers' compensation provider selected by RVU. Following initial first aid, the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless RVU can establish that identification is infeasible or prohibited by state or local law).

- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee or student is provided with the source individual's test results and with information about applicable disclosure laws and regulation concerning the identity and infectious status of the source individual.
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
- If the employee or student does not give consent for HIV serological testing during the collection of blood for baseline testing, preserve the baseline blood sample for 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as possible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Compliance and Quality Assurance Specialist and/or the Manager of Human Resources ensures that health care professionals responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogen standard.

The Compliance and Quality Assurance Specialist and/or the Manager of Human Resources ensure that the health care professional evaluating an employee after an exposure incident receives the following:

- a description of the employee's job duties relevant to the exposure incident
- route(s) of exposure
- circumstances of exposure
- if possible, results of the source individual's blood test
- relevant employee medical records, including vaccination status

The Compliance and Quality Assurance Specialist and/or the Manager of Human Resources provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Compliance and Quality Assurance Specialist and/or the Manager of Human Resources will review the circumstances of all exposure incidents to determine:

- engineering controls in use at the time
- work practices followed
- a description of the device being used (including type and brand)
- protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- location of the incident (O.R., E.R., patient room, etc.)
- procedure being performed when the incident occurred
- employee's training

The Compliance and Quality Assurance Specialist and/or the Manager of Human Resources will record all percutaneous injuries from contaminated sharps in the *Sharps Injury Log* (found in Appendix).

If revisions to this ECP are necessary, the Compliance and Quality Assurance Specialist will ensure that appropriate changes are made. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by an online vendor arranged by the Compliance and Quality Assurance Specialist. All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the OSHA bloodborne pathogen standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE
- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- an explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training session.

Training information for the online CITIProgram vendor are available through the Compliance Office.

RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years in the Compliance Office. (Student training records are maintained the Offices of Clinical Affairs and Primary Care.)

The training records include:

- the dates of the training sessions
- the contents or a summary of the training sessions
- the names and qualifications of persons conducting the training
- the names and job titles of all persons attending the training sessions

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to:

- Patty Gordon, Manager of Human Resources

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

The Manager of Human Resources is responsible for maintenance of the required medical records. These confidential records are kept in the Human Resource Office for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to:

- Patty Gordon, Manager of Human Resources

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- date of the injury
- type and brand of the device involved (syringe, suture needle)
- department or work area where the incident occurred
- explanation of how the incident occurred.

This log is maintained by the Office of Human Resources on the Colorado campus and is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report. A similar log is also maintained on the Utah campus by the Department of Primary Care.

Part 2 Hazard Communication Standard

The following model Hazard Communication Program is based on the requirements of the OSHA Hazard Communications Standard, 29 CFR 1910. 1200. The intent of this model is to provide an easy-to-use format to tailor to the specific requirements of your establishment.

MODEL HAZARD COMMUNICATION PROGRAM

1. Company Policy

To ensure that information about the dangers of all hazardous chemicals used by Rocky Vista University is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the Compliance Office and Human Resource Office for review by any interested employee.

The Compliance and Quality Assurance Specialist is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

The ECP Administrator will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address. He/she will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning. He/she will review the company labeling procedures every 6 months and will update labels as required.

3. Material Safety Data Sheets (MSDSs)

The Compliance and Quality Assurance Specialist is responsible for establishing and monitoring the company MSDS program. He/she will ensure that procedures are developed to obtain the necessary MSDSs and will review incoming MSDSs for new or significant health and safety information. He/she will see that any new information is communicated to affected employees. The procedure below will be followed when an MSDS is not received at the time of initial shipment:

- The originator will be contacted immediately by the ECP Administrator to obtain MSDS information.

Copies of MSDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the Anatomy Lab and the Compliance Office.

MSDSs will be readily available to all employees during each work shift. If an MSDS is not available, contact the ECP Administrator.

MSDSs will be readily available to employees in each work area using the following format:

- Paper copies in a clearly identified three-ring binder

When revised MSDSs are received, the following procedures will be followed to replace old MSDSs:

- The ECP Administrator will replace the old MSDSs.

4. Employee Training and Information

Compliance and Quality Assurance is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation that includes the following information and training:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and MSDSs to obtain hazard information
- Location of the MSDS file and written Hazard Communication Program

Prior to introducing a new chemical hazard into any section of this company, each employee in that section will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

- Live, in person presentation or online training

5. Hazardous Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected employee will be given information by the ECP Administrator about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

Examples of non-routine tasks performed by employees of this company are: NONE

6. Informing Other Employers/Contractors

It is the responsibility of the ECP Administrator to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees. It is also his/her responsibility to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.

Other employers and contractors will be provided with MSDSs for hazardous chemicals generated by this company's operations in the following manner:

- Provided with a copy of the MSDSs
- Provided access to RVU's ECP and Chemical Hygiene Plan

In addition to providing a copy of an MSDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this company.

Also, other employers will be informed of the hazard labels used by the company. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

7. List of Hazardous Chemicals

A list of all known hazardous chemicals used by our employees is attached to this plan. This list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, dates of use, and quantity used. Further information on each chemical may be obtained from the MSDSs, located in the Anatomy Lab and the Compliance Office.

When new chemicals are received, this list is updated (including date the chemicals were introduced) within 30 days. To ensure any new chemical is added in a timely manner, the following procedures shall be followed:

- The ECP Administrator will notify the Office of Compliance and Quality Assurance immediately upon receiving new chemicals.
- The Office of Compliance and Quality Assurance will update the list, the ECP and the Chemical Hygiene Plan as necessary.

8. Chemicals in Unlabeled Pipes

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the Compliance and Quality Assurance Specialist.

- The chemical in the pipes
- Potential hazards
- Required safety precautions.

9. Program Availability

A copy of this program will be made available, upon request, to employees and their representatives.

Updated 8/2018

APPENDIX A

HEPATITIS B VACCINE DECLINATION (MANDATORY)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Signed: _____
(Employee Name)

Date: _____

APPENDIX B

Sharps Injury Log

Rocky Vista University and Rocky Vista Health Clinic

Date	Case - Report #	Type of Device	Work area where injury occurred	Description of incident

29 CFR 1910.1030, OSHA’s Bloodborne Pathogens Standard, in paragraph (h)(5), requires an employer to establish and maintain a Sharps Injury Log for recording all percutaneous injuries in a facility occurring from contaminated sharps. The purpose of the Log is to aid in the evaluation of devices being used in healthcare and other facilities and to identify problem devices or procedures requiring additional attention or review. This log must be kept in addition to the injury and illness log required by 29 CFR 1904. The Sharps Injury Log should include all sharps injuries occurring in a calendar year. The log must be retained for five years following the end of the year to which it relates. The Log must be kept in a manner that preserves the confidentiality of the affected employee.

APPENDIX C

Syllabi Information

Students in health sciences programs are informed that certain risks are involved in health care. These risks include contact with infectious/communicable diseases through exposure to bloodborne pathogens.

Exposure to bloodborne pathogens occurs in many ways. Although needle stick injuries are the most common means of exposure for health care workers, bloodborne pathogens can also be transmitted through contact with eyes, nose, and mouth or through broken skin.

Any direct exposure of a student to the blood or body fluid of a patient or clinical/laboratory partner must be reported to your clinical instructor/supervisor immediately.

APPENDIX D

New Student/Employee Orientation Fact Sheet (p. 1 of 2)

PREVENTING THE SPREAD OF BLOODBORNE PATHOGENS

Bloodborne pathogens, such as bacteria and viruses, are present in blood and body fluids and can cause disease in humans. The bloodborne pathogens of primary concern are hepatitis B, hepatitis C and HIV. These and other bloodborne pathogens are spread primarily through:

- Direct contact. Infected blood or body fluid from one person enters another person's body at a correct entry site, such as infected blood splashing in the eye.
- Indirect contact. A person's skin touches an object that contains the blood or body fluid of an infected person, such as picking up soiled dressings contaminated with an infected person's blood or body fluid.
- Respiratory droplet transmission. A person inhales droplets from an infected person, such as through a cough or sneeze.
- Vector-borne transmission. A person's skin is penetrated by an infectious source, such as an insect bite.

Follow standard precautions to help prevent the spread of bloodborne pathogens and other diseases whenever there is a risk of exposure to blood or other body fluids. These precautions require that all blood and other body fluids be treated as if they are infectious.

Standard precautions include maintaining personal hygiene and using personal protective equipment (PPE), engineering controls, work practice controls, and proper equipment cleaning and spill cleanup procedures.

TO PREVENT INFECTION, FOLLOW THESE GUIDELINES:

- Avoid contact with blood and other body fluids.
- Use CPR breathing barriers, such as resuscitation masks, when giving ventilations (rescue breaths).
- Wear disposable gloves whenever providing care, particularly if you may come into contact with blood or body fluids. Also wear protective coverings, such as a mask, eyewear and a gown, if blood or other body fluids can splash.
- Cover any cuts, scrapes or sores and remove jewelry, including rings, before wearing disposable gloves.
- Change gloves before providing care to a different victim.
- Remove disposable gloves without contacting the soiled part of the gloves and dispose of them in a proper container.
- Thoroughly wash your hands and other areas immediately after providing care. Use alcohol-based hand sanitizer where hand-washing facilities are not available if your hands are not visibly soiled. When practical, wash your hands before providing care.

TO REDUCE THE RISK OF EXPOSURE, FOLLOW THESE ENGINEERING AND WORK PRACTICE CONTROLS:

- Use biohazard bags to dispose of contaminated materials, such as used gloves and bandages. Place all soiled clothing in marked plastic bags for disposal or cleaning. Biohazard warning labels are required on any container holding contaminated materials.
- Use sharps disposal containers to place sharps items, such as needles.
- Clean and disinfect all equipment and work surfaces soiled by blood or body fluids.
 - Scrub soiled boots, leather shoes and other leather goods, such as belts, with soap, a brush and hot water. If worn, wash and dry uniforms according to the manufacturer's instructions.

IF YOU ARE EXPOSED, TAKE THE FOLLOWING STEPS IMMEDIATELY:

- Stop the activity
- Wash / flush the affected area(s)
- Immediately report the incident to a clinical instructor or supervisor
- Seek medical attention from the RVU Health Clinic
- Complete necessary reports provided by the clinical instructor or the RVU Health Clinic
- The Dean is available for guidance in obtaining medical evaluation, treatment and follow-up

APPENDIX E

Standard Operating Procedure (SOP) for Cleanup of Small Blood Spills

Follow these procedures for cleaning up spills of blood and blood products. The same procedures can be used for cleaning up other body fluids.

STEP 1: REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Prior to beginning the cleanup, don a pair of rubber, latex, PVC or similar type gloves.

For small blood spills no other PPE should be required.

STEP 2: SPILL KIT EQUIPMENT

The following items may be needed in handling the spill:

- 10% bleach solution (or Lysol, virex or other EPA reg. Tuberculocidal)
- gloves
- clear plastic bags
- biohazard labels
- leak-proof sharps containers
- brush & dustpan, or tongs or forceps for picking up sharps
- disinfectant wipes

STEP 3: SPILL DECONTAMINATION PROCEDURES

Cover the spill area with a paper towel and then pour freshly mixed 10% bleach and water solution. Allow solution to soak into the contaminated material for 10 minutes. Work from the outside edges of the spill inward when applying the bleach solution.

Any glass, needles, or other sharp objects that may puncture the skin will not be picked up by hand. Only mechanical means such as a brush and dustpan, tongs, or forceps are allowed.

Wipe up bleached material with paper towels or absorbent pads. It may be necessary to use a scrub brush to remove the material if it impacted a hard porous surface such as concrete. If nonporous surfaces, such as a carpet have been contaminated, an outside vendor may be needed to clean the area.

STEP 3: DISPOSAL

Place bleached material, gloves and other disposable materials into a labeled biohazard bag and place into either another labeled biohazard bag or container. Ensure lids are firmly sealed on all waste containers when spill cleanup is complete.

STEP 4: DECONTAMINATE RE-USEABLE EQUIPMENT

Decontaminate with the bleach solution all potentially contaminated re-useable tools or protective equipment used in the cleanup. This includes dustpans, brooms, forceps, buckets, etc. Anything that cannot be effectively cleaned (bleach solution must be able to make contact with all surfaces) must be disposed as waste. After the contaminated area has been cleaned, use fresh water to remove bleach residue from all surfaces.

STEP 5: WASH YOUR HANDS

If hand-washing facilities are not available at the job site use disinfectant wipes and then wash your hands as soon as possible.

BIOHAZARD EXPOSURE

If you believe you were exposed (skin puncture or splash to eyes or mucous membranes) to biohazard material that had not been decontaminated with the bleach solution follow these recommended steps:

- Skin exposure: Vigorously wash affected skin with plenty of soap and water while removing contaminated clothing and shoes.
- Eye exposure: Wash eyes for at least 10 minutes with copious amounts of water, lifting the upper and lower eyelids occasionally.
- Seek follow-up medical attention by contacting the RVU Health Clinic.

APPENDIX F:



Rocky Vista Health Center Needlestick and Sharps Injuries

Policy:

Employees must record all work-related needlestick injuries and cuts from sharp objects which are contaminated with another person's blood or other potentially infectious material. You must enter the injury or cut in the OSHA 300 Log as an injury. To protect the employee's privacy, do not enter the employee's name on the OSHA 300 Log.

Basic requirement. If an employee is medically removed under the medical surveillance requirements of an OSHA standard, you must record the case on the OSHA 300 Log.

How do I classify medical removal cases on the OSHA 300 Log? You must enter each medical removal case on the OSHA 300 Log as either a case involving days away from work or a case involving restricted work activity, depending on how you decide to comply with the medical removal requirement. If the medical removal is the result of a chemical exposure, you must enter the case on the OSHA 300 Log by checking the "poisoning" column.

Do all of OSHA's standards have medical removal provisions? No, some OSHA standards, such as the standards covering bloodborne pathogens and noise, do not have medical removal provisions. Many OSHA standards that cover specific chemical substances have medical removal provisions. These standards include, but are not limited to, lead, cadmium, methylene chloride, formaldehyde, and benzene.

Do I have to record a case where I voluntarily removed the employee from exposure before the medical removal criteria in an OSHA standard are met? No, if the case involves voluntary medical removal before the medical removal levels required by an OSHA standard, you do not need to record the case on the OSHA 300 Log.

Potential Hazard

Exposure to blood and other potential infectious materials from contaminated sharps injuries.

Primary Prevention of Exposure

1. Engineering controls
 - a. Sharps disposal containers
2. Work Practice controls
 - a. Student/Faculty training with regards to universal precautions, personal protective equipment, and the proper handling and containerization of sharps
 - b. Maintenance of injuries log

Subsequent to Exposure

1. Immediately following exposure
 - a. Wash injured body site with soap and water
 - b. Flush splashes to the nose, mouth, or skin with water
 - c. Irrigate eyes with clean water, saline, or sterile irrigates
 - d. Report the incident to supervising faculty
 - e. Seek medical treatment immediately
2. Prompt medical evaluation accompanied by the appropriate prophylaxis and follow-up care is advised, at a location of the individual's choice
 - a. Sunset InstaCare
 - i. 1739 W Sunset Blvd, St George, UT
 - ii. (435) 634-6050
 - iii. Hours: 9am-9pm
 - b. Intermountain Healthcare InstaCare or ER
 - i. 577 S River Rd, St George, UT
 - ii. (435) 688-6300
 - iii. Hours: InstaCare 9am-9pm. ER open 24/7.
3. Sharps injury log on the Utah campus is maintained by and located in the office of the administrative assistant in the Department of Primary Care.
 - a. Administrative Assistant, Department of Primary Care: Kristin Mugleston
 - b. Contact: 435-222-1281

References: Occupational Safety and Health Administration.

<https://www.osha.gov/SLTC/etools/hospital/hazards/sharps/sharps.html>. Accessed 10/12/17.

Appendix H

Post-Exposure Evaluation Protocol, RVUCOM-CO

Potential Hazard

Exposure to blood and other potential infectious materials from contaminated sharps injuries.

Primary Prevention of Exposure

3. Engineering controls
 - a. Sharps disposal containers
4. Work Practice controls
 - a. Student/Faculty training with regards to universal precautions, personal protective equipment, and the proper handling and containerization of sharps
 - b. Maintenance of injuries log

Subsequent to Exposure

4. Immediately following exposure
 - a. Wash injured body site with soap and water
 - b. Flush splashes to the nose, mouth, or skin with water
 - c. Irrigate eyes with clean water, saline, or sterile irrigates
 - d. Report the incident to supervising faculty
 - e. Seek medical treatment immediately
5. Prompt medical evaluation accompanied by the appropriate prophylaxis and follow-up care is advised, at a location of the individual's choice
 - a. Rocky Vista University Health Center
 - i. 8401 S Chambers Road, Parker, CO 89134
 - ii. (720) 875-2880
 - iii. Hours: 8am-5pm, M-F
6. Sharps injury log on the Colorado campus is maintained by and located in the office of the administrative assistant in the Department of Primary Care.
 - a. Administrative Assistant, Department of Primary Care: Molly Hunsberger
 - b. Contact: 720-875-2828

References: Occupational Safety and Health Administration.

<https://www.osha.gov/SLTC/etools/hospital/hazards/sharps/sharps.html>. Accessed 10/12/17.

Document 5.3.d

**Biosafety, Universal Precautions, and Bloodborne Pathogen
statement -Student Handbook pgs 8, 9**

Link to Published [Document](#) on RVU website

munity despite the best efforts of the Security Department and the administrative staff. A truly safe campus can only be achieved through shared responsibility of all members of the RVU community.

The University is committed to maintaining a safe environment to support a healthy, learning-centered campus. This commitment includes making necessary physical improvements that would promote safety and well-being, the revision and updating of policies, procedures and rules, and an obligation to hold accountable those who choose to commit crimes or violate rules and regulations.

Every student, faculty, staff member and visitor has an individual responsibility to be aware of their personal safety, to properly utilize college resources, to make positive choices, and use common sense. Crimes, violations, hate crimes, suspicious persons or activity, and safety issues should be reported upon discovery through the appropriate channels as described in this Handbook. Please take the time to familiarize yourself with the emergency procedures and the important information on the website. Updates, timely warnings, and important information regarding safety on campus will be brought to you by emails, fliers, TV monitors and other presentations.

For more information, view the RVU Annual Security Report at: <http://www.rvu.edu/campus-life/campus-safety-and-security>

Health Insurance Portability and Accountability Act (HIPAA)

The HIPAA Privacy Rule (Public Law 104-191) regulates the use and disbursement of individually identifiable health information and gives individuals the right to determine and restrict access to their health information. It requires that reasonable and appropriate technical, physical, and administrative safeguards be taken with electronic individually identifiable health information. Specifically, we must ensure the confidentiality, integrity, and availability of all electronic protected health information we create, receive, maintain or transmit.

All students at Rocky Vista University must complete a training course over the privacy laws which apply to the Health Professions to meet requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Annual refresher training is required, as well. The HIPAA training is provided online and information to access training will be provided at orientation. A score of 80% or better on the HIPAA training course is a

requirement prior to entering RVU programs.

All RVU students are required to abide by all rules, regulations, and policies of HIPAA. RVU has a zero tolerance policy for violation of patient privacy, and failure to adhere to the mandates of HIPAA is grounds for immediate dismissal from the program.

Students are further expressly prohibited from taking photographs or video of patients without proper preceptor and patient consent. Any and all photographs or videos properly obtained are to be used for educational purposes only and shall not be distributed in any fashion, including, but not limited to, email, hard copying, or social media. The improper acquisition, use, or dissemination of any patient photos or videos is considered a significant violation of both HIPAA and program policies and may result in immediate dismissal from the program.

OSHA - Biosafety, Universal Precautions, and Bloodborne Pathogens

All students must also complete a basic training course in biosafety, as required by the Occupational Safety and Health Administration (OSHA). Because patient contact and/or hands-on learning is a required part of the RVU curriculum, all RVU students must complete OSHA training annually. The avenue chosen for completion of this training is the Collaborative Institutional Training Initiative (CITI) online program.

Instructions for registering and logging onto the CITI website, and specific instructions on which courses are required, are provided annually by the Compliance Office.

Needlestick and Bloodborne Pathogen Exposure

Students will potentially come into contact with, or be exposed to, blood and other infectious bodily fluids, whether by direct contact or respiration. Students are also at risk for clinical-related injuries, such as accidental needlesticks. Immediate attention and care of such exposures and injuries are vital to minimize any potential infection.

Upon matriculation and each year of program enrollment thereafter, all students are required to complete online training for prevention of exposures to infectious and

environmental hazards. Additionally, prior to beginning clinical experiences, students are provided a quick-reference guide detailing appropriate procedures to follow in the event of an exposure or needlestick injury. Once a student has experienced an exposure or needlestick, the student shall seek immediate treatment in accordance with current and appropriate medical standards. The student shall immediately notify his/her preceptor and fill out any and all forms required by the clinical sites. Should students incur any costs related to evaluation and treatment of an exposure or needlestick injury, the student should submit all claims for payment to his/her insurance company.

Professional Malpractice and Workers' Compensation Insurance

Students are covered by RVU's professional malpractice and workers' compensation insurance for all RVU-sponsored curricular and co-curricular activities, including rotations, shadowing, health fairs, medical mission trips, etc. Any student who is injured while on clinical rotation must notify the Associate Dean of Clinical Affairs and Human Resources immediately. Students are not covered for non-RVU activities.

The Family Educational Rights & Privacy Act (FERPA)

The Family Educational Rights and Privacy Act (FERPA) affords eligible students certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution.) These rights include:

1. The right to inspect and review the student's education records within 45 days after the day RVU receives a request for access. A student must submit to the Registrar, Dean, head of the academic department, or other appropriate official, with a copy to the Registrar, a written request that identifies the record(s) the student wishes to inspect. The school official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the school official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.
2. The right to request the amendment of the student's education records that the student believes are inaccurate, misleading, or otherwise in violation of the student's pri-

vacancy rights under FERPA.

A student who wishes to ask RVU to amend a record should write the RVU official responsible for the record, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If RVU decides not to amend the record as requested, RVU will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

3. The right to provide written consent before the university discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

A. RVU discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person:

- employed by RVU in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff);
- serving on the board of trustees;
- a student serving on an official committee, such as a disciplinary or grievance committee; or,
- a volunteer or contractor outside of RVU who performs an institutional service or function for which RVU would otherwise use its own employees and who is under the direct control of RVU with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks, or an agency performing drug/background checks on behalf of RVU.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for RVU.

B. RVU may also disclose education records without a student's prior written consent to:

- organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction;

Document 5.3.e

Notification of Required CITI training and Instructions

From: [Laura Dement](#)
To: [Class of 2020](#)
Cc: [Brian Leary](#); [Amy Schlueter](#); [Jaime Covington](#)
Subject: Friendly Reminder OSHA/HIPAA Course Requirement
Date: Tuesday, May 29, 2018 8:41:31 AM
Attachments: [image003.png](#)
[image004.png](#)
[CITI Progr. Instructions OMSIV as of 06-01-18..Class of 2019.docx](#)

For those of you who have not had the chance of completing the OSHA/HIPAA course yet, you have two and a half weeks remaining to do so (by June 15). Please see the message below. Thank you!

Laura Dement, MA ED

*Title IX Coordinator and
Compliance Specialist*

Rocky Vista University
8401 S. Chambers Road • Parker, CO 80134
(720) 874-2481
ldement@rvu.edu
www.rvu.edu

From: Laura Dement
Sent: Friday, May 4, 2018 10:09 AM
To: Class of 2019 <classof2019@rvu.edu>
Cc: Jaime Covington <jcovington@rvu.edu>; Brian Leary <bleary@rvu.edu>; Amy Schlueter <aschlueter@rvu.edu>
Subject: OSHA/HIPAA Course Requirement
Importance: High

Dear Class of 2020 Student (currently OMS II becoming OMS III),

It is that time of the year again for completing the required Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Occupational Safety and Health Administration (OSHA) training. (Instructions are attached.)

All medical students involved in clinical coursework at Rocky Vista University (*therefore, all students*) must complete this training annually. **Clinical rotation sites will require documentation of this annual training before they will allow third and fourth year students to rotate as an RVU student.**

The mechanism chosen for completion of this training is the Collaborative Institutional Training Initiative (CITI, www.citiprogram.org), provided through the University of Miami.

You should already have a CITI login (Username and Password) from completion of the training last year. (If you have forgotten these, click on the "Forgot My Login Information" link on the CITI website.)

Note: while you are currently an OMS II student, you will be taking the CITI course for OMS III students so that you are eligible for clinical rotations next term.

The training should take you no more than a couple of hours to complete, and it **must be completed by June 15**. CITI will automatically contact RVU upon the successful completion of your training and Jaime Covington (jcovington@rvu.edu) in Clinical Affairs will send you your certificate.

Laura Dement, MA ED

*Title IX Coordinator and
Compliance Specialist*

Rocky Vista University

Achieving New Heights in Medical Education

8401 S. Chambers Road • Parker, CO 80134
(720) 874-2481
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www.rvu.edu





HIPAA & OSHA Training at Rocky Vista University

The Health Insurance Portability and Accountability Act of 1996

All medical students involved in clinical courses at Rocky Vista University must complete a training course over the privacy laws which apply to the Health Professions to meet requirements of the Health Insurance Portability and Accountability Act of 1996 (**HIPAA**). All medical students must also complete a basic training course in biosafety, as required by the Occupational Safety and Health Administration (**OSHA**).

HIPAA requirements mandate that a covered entity provide training to all members of its workforce about the institution's "privacy policies and procedures with respect to protected health information...as necessary and appropriate for the members of the workforce to carry out their function within the covered entity" [45 CFR 164.530(b)(1)]. This Rule defines "workforce" as "employees, volunteers, trainees, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity" [45 CFR 160.103].

Under the Rule, the definition of "Trainees" includes medical students, residents, and other health professions students. The Rule does not specify the method of training, but requires the covered entity to document that training has been provided. [45 CFR 164.503(b)(2)(ii)].

Because patient contact is a required part of the RVUCOM curriculum all RVUCOM students must complete HIPAA and OSHA training. The avenue chosen for completion of this training is the Collaborative Institutional Training Initiative (CITI), provided through the University of Miami. Instructions for registering and logging onto the CITI website, and specific instructions on which courses are required, are provided in the following document.

To log onto the Collaborative Institutional Training Initiative (CITI) Program website, follow the instructions below:

1. Open your internet browser, and go to the address below:

<https://www.citiprogram.org/>

2. You should have already created a username and password from last year's CITI training, so go to "Log In" (rather than "Register") and use your previously created log in information.

3. Check to be sure you are logged in under **Rocky Vista University**.

Note: If when you log in, you are not logged in under Rocky Vista University, click on the "Affiliate with another institution" link, and select "Rocky Vista University" from the drop-down list of "Participating Institutions". (Ignore the other drop-downs in this section.)

4. Click on the "**Add a course or update your learner groups for Rocky Vista University**" link.

5. Select the CITI course you are required to complete for OSHA/HIPPA training.

a. Do not check anything in Section 1.

b. Question 2 – select "**Basic Biosafety and Health Information Privacy course – OMS IV**". (This is the HIPAA you must complete.)

c. Question 3 – select "Not at this time".

d. Question 4 – select "Not at this time".

e. Question 5 – select "**Basic Biosafety Training for Medical Students**". (You do not need to complete this course, but must select it for enrollment purposes.)

10. Click on the "**Complete Registration**" (or submit) button. You will be taken to your list of "**Rocky Vista University Courses**".

11. In response to the "**Register with another institution**" question, select "**No**". (This can be modified at any time, should this become useful to you in the future.)

12. You are now ready to begin the courses. Select the CITI course you are required to complete for OSHA/HIPPA training by clicking on the course title ("**Basic Biosafety and Health Information Privacy course – OMS IV**").

13. On the course page, click on the "**Complete The Integrity Assurance Statement before beginning the course**" to complete the Integrity/Assurance statement.

14. Complete the course by sequentially selecting each required module, and completing the reading and the module's quiz, then proceeding to the next module. (NOTE: not all modules have quizzes.) Follow the directions to complete each required module for each required course.

15. When you complete each required course: You should print the “Completion Report” for your own records. The Clinical Affairs department will automatically receive confirmation of your CITI course completion.

Contact info for Clinical Affairs:

Brian Leary
Clinical Affairs Manager
bleary@rvu.edu

Alternate Contact info:

Jaime Covington
Administrative Assistant
jcovington@rvu.edu

If you have questions about or encounter problems with the CITI site, please contact:

Laura Dement
CITI Program Administrator
RVU Compliance Office
ldement@rvu.edu

Document 5.3.f

**Primary Care Medicine Syllabus Section
(Policy cited in all PCM
syllabi)**

Make-Up Examination/Re-Examination/Remediation

All make-up examinations/re-examinations/remediation will be handled according to the policies as stated in the Student Handbook. If needed, any questions or issues should be directed to the Course Director.

Disabilities and Academic Accommodations

The course will comply with ADA guidelines for any student officially certified under the ADA and any other legal requirements as applied to examinations as specified by RVUCOM policies, procedures and administration. Rocky Vista University complies with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990.

Test Appeal Policy

The test appeal policy regarding any grade or testing issues will be consistent with the policies stated in the Student Handbook. If needed, any questions or issues should be directed to the Course Director.

Course and Instructor Evaluation

Each student will be expected to complete a course and instructor evaluation at the end of the semester. The student is expected to be honest and constructive with their evaluations. These evaluations will be completed on-line.

Statement Regarding Reservation of Power

This syllabus is not intended as a contract between the students and the Department of Primary Care and the College of Osteopathic Medicine. The curriculum, syllabus and information contained within the course can be altered or changed at any time. In the event of any changes or alterations during the course, the student and class will be informed officially through the COM's student email service. It is the student's responsibility to obtain the changes or notices even if absent from class.

RVU Blood borne Pathogen Policy

Students in health sciences programs are informed that certain risks are involved in health care. These risks include contact with infectious/communicable diseases through exposure to blood borne pathogens.

Exposure to blood borne pathogens occurs in many ways. Although needle stick injuries are the most common means of exposure for health care workers, blood borne pathogens can also be transmitted through contact with eyes, nose, and mouth or through broken skin.

Any direct exposure of a student to the blood or body fluid of a patient or clinical/laboratory partner must be reported to your clinical instructor/supervisor immediately.

Document 5.3.g

Primary Care Medicine Lab Manual Section on Procedures

Medical Safety and OSHA Regulations, Gown and Gloving and Aseptic Technique

Reviewing videos on the procedure can be very useful. [YouTube](#) and [Procedures Consult](#) (part of MDConsult) and others by nursing and scrub tech. organizations are a few that have been recommended.

SCRUBBING

The use of sterile technique begins in the locker room. Change into scrub clothing (remove t-shirts and tuck the scrub shirt into the pants.) Scrub clothes may occasionally be worn on the wards, provided that they are covered by a clinic coat or some other form of gown.

Next you will put on your cap, mask and shoe covers. If required, put in the back strap inside your shoe, it is for grounding purposes. The idea is to cover your nose, mouth and all your hair. Full hoods are necessary for men with beards. If you wear glasses, it is often helpful to tape the mask to the bridge of your nose to prevent fogging during the case. Then tape the glasses to your forehead if you think they may be loose enough to fall off.

Do not wear nail polish and remove any loose jewelry, watches and rings before scrubbing. Special precautions such as double gloving and eye protection should be performed when operating on patients with communicable diseases such as hepatitis and AIDS.

THE SURGICAL SCRUB: Brush Stroke Method

1. Turn on water and regulate flow and temperature. Many sinks now come equipped with leg or foot controls, take note.
2. Open scrub package and lay aside. Make sure that you are not allergic to any of the soaps or disinfectants used in the scrub.
3. Wet hands and arms and perform a pre-scrub wash with a provided detergent to about 2 inches above the elbows.
4. Rinse hands and arms thoroughly, being careful not to touch any unsterile object.
5. Retrieve the sterile brush and file. Moisten the brush to create lather, and then use the file to clean under the fingernails. Fingernails should be cleaned under running water.
6. Discard the file into the appropriate receptacle; be careful not to touch anything.
7. Produce lather with the sponge side of the brush and then use the sponge's bristle to scrub under the fingernails with about 30 strokes.
8. Consider each finger, hand and arm as being four planar sided. Each surface should then be scrubbed with about 20 circular strokes. Use the bristle side of the brush for the digits and the sponge side for the hand and arm (to 2 inches past the elbow) on one side before moving to the other.

9. Add soap or water to the brush as needed during the scrubbing process.
10. Discard the brush into the appropriate receptacle.
11. Rinse hands and arms thoroughly, allowing water to run from the hands to the elbows.
12. Lean forward as you dry your hands and arms with a sterile towel. DO not allow any part of the towel or your hands to touch an unsterile object. Use one end of the towel to thoroughly dry one hand and arm, then use the opposite end of the towel to dry the other hand and arm. Many times the scrub nurse will assist you in the drying process, after you enter the OR. If that is the case, you enter the room by pushing the door “open” with your back, spinning around as you enter the room. Also, make sure that your arms are held high above your waist.

GOWNING AND GLOVING

You are now ready to don your surgical gown:

Important note: If you touch the outside of the gown while putting it on, it is then considered contaminated and must be discarded. After scrubbing, the hands and arms are considered contaminated if they fall below the waist or touch the body. Only certain areas are considered sterile after donning the gown: the sleeves (Excluding the axillary region) and the front of the gown from the waist to a few inches below the neck opening.

SELF GOWNING METHOD

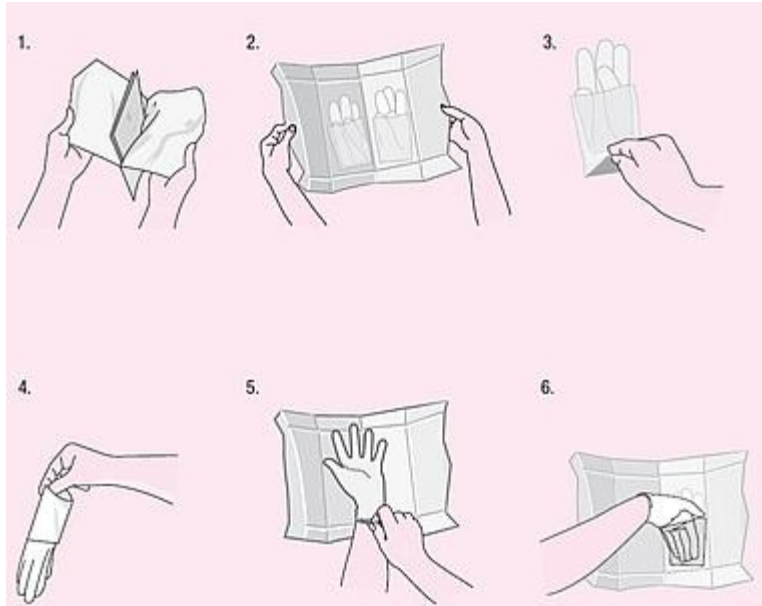
1. Pick up the gown in its wrapper. Pull the wrapper’s tab away from you and grasp with the hand holding the gown. Continue this until all 4 corners have been opened revealing the sterile gown. The gown is folded with the inside revealed. Grasp the gown and remove it from the packaging.
2. Grasp the inside shoulder seams and open the gown with the armholes facing toward you. While holding the gown, allow it to fall open without touching any unsterile objects (including your body).
3. Slide your arms into the sleeves about $\frac{3}{4}$ of the way down.
4. Have an assistant pull the gown up and over your shoulders while you slide your arms to the beginning of the sleeve cuffs and grasp them from the inside to prevent your hands from protruding beyond the sleeve cuff. Have the assistant fasten the back of the gown.

DONNING SURGICAL GLOVES - CLOSED CUFF METHOD

This method is preferable because you are less likely to contaminate yourself.

1. Open sterile gloves and have them ready to pick up before you begin donning the gown.
2. Create a tuck in the cuff of the gown by grasping the material with your hand from within the cuff.

3. Pick up one glove by the folded cuff edge with the sleeve-covered hand. It may be easier to put on the left glove first if you are right-handed, and vice versa if you are left handed.



4. The Final Gown Tie occurs after donning your gloves. Grasp the paper tab attached to the front of the gown and hand the opposite end to the scrub nurse or an assistant. Remember you are now sterile. The assistant may not be!!!!

5. Release the paper tab and turn around in a circle while the assistant remains holding firmly on to the paper tab.
6. Have the assistant securely hold the paper tab as you pull the belt loose from the paper tab and tie it to the belt tie attached to the front of the gown.

OPEN CUFF METHOD

The open cuff method is usually done when you do not have an assistant. This is done commonly in the office setting for small procedures. After opening the packaging on a flat surface, touching only the outside of the package.

1. Pick up the sterile glove with your fingertips making sure that you are only manipulating the inside portion of the glove, and slide your opposite hand into the glove. Be careful not to touch any portion of the glove sleeve or exterior of the glove with your hand.
2. Release the glove after it has been pulled over the sleeve cuff
3. Grab the other sterile glove with the already gloved hand by placing fingers within the fold of the glove.
4. Stretch the glove over the opposite hand and pull the cuff down over the sleeve cuff.

“SHARPS” HANDLING

ASEPTIC TECHNIQUE, HANDLING SHARPS AND NEEDLES

Sharps are any item that can cause any type of percutaneous injury. The injury can occur with the patient as well as the healthcare provider. You will have the opportunity to handle various types of “sharps” while under supervision so you can become familiar with how to handle these devices in a safe manner.

If possible, get a good look at the “sharp” prior to opening the packaging and READ any instructions that may accompany it. You should always don gloves prior to working with any type of sharp. Remember; always handle all sharps as though they are already “contaminated” with a body fluid.

The SHARPS provided for this lab will include various types of syringe/needle combinations, scalpels, suturing and other surgical items. Please look at and handle all of them. Be sure to dispose of properly before the end of the laboratory.

In case of injury, please inform your facilitator immediately.



Document 5.3.h

**Clinical Education Manual Policy- Universal Precautions –Needle
Stick**

Universal Precautions

Student doctors must follow universal precautions at all times while on rotation.

Needle stick and Disease Exposure Policy

Students are potentially exposed to blood and/or potentially infectious body fluids via percutaneous (e.g., needle stick) or mucocutaneous exposures in clinical settings, and thus are at risk of acquiring infectious diseases from blood borne infections. Prompt evaluation of exposures to blood and/or potentially infectious body fluids prevents or reduces risk of infection from blood borne diseases. Exposure is an incident in which an eye, mouth, other mucous membrane, non-intact skin or parenteral contact with blood or other potentially infectious materials results while performing an assigned rotational task as a medical student. Body fluids considered potentially infectious include: blood and blood products, any bodily fluid contaminated with blood, semen, saliva, cerebrospinal fluid, amniotic fluid and vaginal secretions, pleural fluid, peritoneal fluid, pericardial fluid, and synovial fluid. The student must give consent for treatment in accordance to the directives of the treating facility/facilities before collection of the student's blood and before any serologic testing can be done on the student. Consent of the source individual is dependent upon the State Laws in which the event occurs. State Statutes state that "When a healthcare provider or employee of a health care facility is involved in an accidental direct skin or mucous membrane contact with the blood or bodily fluids of an individual which is of a nature that may transmit HIV, written informed consent of the source (patient) individual to perform an HIV test is not required."



Consent of the source individual is dependent upon the State Laws in which the event occurs. State Statutes state that "When a healthcare provider or employee of a health care facility is involved in an accidental direct skin or mucous membrane contact with the blood or bodily fluids of an individual which is of a nature that may transmit HIV, written informed consent of the source (patient) individual to perform an HIV test is not required."

Steps for dealing with exposure:

A student who is exposed to a patient via blood or potentially infectious body fluid must:

1. Seek immediate treatment and follow-up in accordance with appropriate medical standards.
2. All hospitals and ambulatory clinics will have a policy for handling exposure to contagious diseases. In the event a student is exposed, he/she should contact the proper personnel at the rotation site. This may differ at each site (e.g., the Department of Human Resources, the Director of Medical Education office, and/or the nursing staff).
3. The student must go immediately to an emergency department or designated healthcare provider.
 - a. The student must give the emergency department his/her private health insurance as your method of payment.
 - b. The student's own insurance card should cover part or all of the initial treatment and follow-up.

- c. Any portion not covered is not the responsibility of the student, but will be covered by Risk Management of Rocky Vista University in the event that this is actually related to a student rotational activity and the student follows this protocol including notifications.
4. Students should immediately notify the Preceptor of the occurrence.
5. Students must immediately report any injury to treatment to the Office of Clinical Affairs and Human Resources at RVUCOM.

Counseling and Support

Refer to the *RVUCOM 2017-18 Handbook & Catalog*.

Communication

Now that the students' primary classroom will be off-campus, email is the primary mode of communication between the student and the University. It is the student's responsibility to continue accessing his/her RVUCOM email account on a regular basis and keep the account capacity ready to accept new messages. Additionally, it is the student's responsibility to keep the Office of Student Affairs and the Office of Clinical Affairs current on his/her mailing address, phone number and emergency contact information.

Dress Code

Student attire is best established by the clinical training site. RVU recommends the following guidelines for student attire:

- All students are to wear identification
- Female students - professional dress – no leggings, short dresses or skirts, cleavage showing or open toed shoes. They will also need to wear your white coat as appropriate
- Male students – professional dress - Slacks, collared shirt and tie They will also need to wear your white coat as appropriate
- Students may wear scrubs as is appropriate for the clinical rotation – must be clean

Title

Students are referred to as “Student Doctor ___” in clinical settings. If students have a doctorate in any field, they cannot use that title while in any settings related to their education whether in a student environment, or not.

Academic Standards

Refer to the *RVUCOM 2017-18 Handbook & Catalog*.

Document 5.3.i

**Employee Policy (Faculty & Health Workers) OSHA
Requirements/Bloodborne Pathogens/HBV**

Link to Published [Document](#) on Dynamic Policy



EMPLOYEE POLICY (FACULTY & HEALTH WORKERS)

Executed October 1, 2017

OSHA Requirements/Bloodborne Pathogens/HBV

The Occupational Safety and Hazard Administration(OSHA) has mandated that all workers who have a reasonable risk of exposure to blood or other bodily fluids (OPIM) during the course of their work are required to (a) have or receive training in Universal Precautions for Bloodborne Pathogens on an annual basis, and (b) have a Hepatitis B vaccination administered free of charge. (OSHA 29 CFR 1910.1030)

This policy particularly applies to employees of the Rocky Vista Health Center and also any Rocky Vista University Faculty determined by department chairpersons to have a reasonable risk of exposure to bloodborne pathogens (e.g. lab courses, anatomy courses). This is especially important in the case of those who routinely come into contact with syringes or other sharp objects, whose primary purpose is to draw blood or make incisions, and those who work with cadaver or live human bodies, due to the extremely infectious nature of the Hepatitis B virus.

The vaccine itself must be offered to employees at no cost and during a reasonable time by the employer (within 10 days of employment) in order for them to be in compliance with the guidelines. The Office of Human Resources, along with the chairperson of the department for which the employee is being hired, will determine if any new employee would be at risk for exposure to bloodborne pathogens. The Center for Disease Control (CDC) is in charge of determining the normal course of vaccination guidelines, and all procedures must be in line with their rules.

For the employee who needs to receive the vaccination, this means that they will receive a course of three shots over a six-month period. Regulations maintain that the individual must then be tested for antibodies. If the test turns up negative, then another course of the vaccine is given. Non-responders must be medically evaluated if no antibodies are found to be present in their system.

Any at-risk employee who declines the vaccine must sign a form that declares they voluntarily did not receive it and ensure it is returned to the Office of Human Resources. This declination form is kept in the employee file, and if the person who opted out later decides to receive the vaccination, then the employer is still obligated to provide it with the above guidelines.

(Consent/Declination Form follows this page.)

Note: Existing employees of the Parker, CO RVU campus may obtain the vaccine at the RVU Health Clinic. NEW employees shall use Concentra Clinics as directed by Human Resources.

Employees of the Ivins, UT campus may obtain the vaccine at the Intermountain WorkMed at 385 North 3050 East, St. George, Utah 84790; 435-251-2630

If you consent and receive the vaccine, the designated clinics will return information to the Office of Human Resources as per agreement.

Document 5.3.j

OSHA and HIPPA Training policy

Link to Published [Document](#) on Dynamic Policy



HIPAA & OSHA Training at Rocky Vista University

The Health Insurance Portability and Accountability Act of 1996

All medical students involved in clinical courses at Rocky Vista University must complete a training course over the privacy laws which apply to the Health Professions to meet requirements of the Health Insurance Portability and Accountability Act of 1996 (**HIPAA**). All medical students must also complete a basic training course in biosafety, as required by the Occupational Safety and Health Administration (**OSHA**).

HIPAA requirements mandate that a covered entity provide training to all members of its workforce about the institution's "privacy policies and procedures with respect to protected health information...as necessary and appropriate for the members of the workforce to carry out their function within the covered entity" [45 CFR 164.530(b)(1)]. This Rule defines "workforce" as "employees, volunteers, trainees, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity" [45 CFR 160.103].

Under the Rule, the definition of "Trainees" includes medical students, residents, and other health professions students. The Rule does not specify the method of training, but requires the covered entity to document that training has been provided. [45 CFR 164.503(b)(2)(ii)].

Because patient contact is a required part of the RVUCOM curriculum all RVUCOM students must complete HIPAA and OSHA training. The avenue chosen for completion of this training is the Collaborative Institutional Training Initiative (CITI), provided through the University of Miami. Instructions for registering and logging onto the CITI website, and specific instructions on which courses are required, are provided in the following document.

STUDENT MENTAL HEALTH & WELLNESS POLICIES & PROCEDURES



Excerpt from the student handbook (page 35):

“Mental Health Counseling All students have access to a variety of mental health services, including individual and couples counseling, workshops, and 24/7 psychiatric services. Information is maintained and posted in the Office of Student Affairs and is listed on the RVU website and other strategic locations throughout the campus. Mental Health Counseling is available for students and their families through the Office of Student Affairs at no cost. When receiving services outside of the University, the individual student and his/her personal health insurance are responsible for all fees that are incurred through the utilization of such services.”

The RVU Mental Health & Wellness Center provides a confidential, safe environment for students to explore issues of concern, resolve psychological distress, and maximize their potential as medical professionals. We seek to offer a high standard of care as we offer a wide range of services.

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Introduction

Mental Health and Wellness Services is a part of Student Affairs. The Office of Student Affairs is responsible for co-curricular life. Its programs and policies are founded on the belief that life outside of the classroom influences a student’s life, growth and development as much as the academic experience.

Programs and events reflect the importance of the student’s life experience of the University. The process of self-governance outside of the University encourages the students to resolve conflicts and to learn how to live effectively in a community. These programs and events are diversified, but all support the idea that education is a process of intellectual, social growth and change.

The Counseling Center provides a professional and confidential setting for the psychological, emotional and developmental support of students as they pursue their academic goals and personal growth. Counseling Services also acts as a resource for faculty and staff to assist them with their interactions with students. When accomplished, the quality of students are more likely to achieve academic and personal success.

Goals derived from Counseling Services include:

1. Promote the psychological and emotional wellbeing of students.

2. Enhance students' academic and personal functioning.

The Mental Health and Wellness Center is not a treatment center. Please consult the Scope of Practice for a complete list of services provided.

RVU Mission and Vision

University Mission Statement

Rocky Vista University provides quality healthcare education while inspiring students to serve with compassion, integrity and excellence.

RVUCOM Mission Statement

To educate and inspire students to become highly competent osteopathic physicians and lifelong learners prepared to meet the diverse healthcare needs of tomorrow through innovative education, relevant research, and compassionate service.

Vision Statement

Achieving New Heights in Medical Education

Core Values

Integrity

The quality of living a unified life in which one's convictions are well-considered and match one's actions, demonstrating fairness, honesty, sincerity, professionalism, and a consistent commitment to our mission, vision, and values.

Collegiality

Mutual respect, collaboration, and the open exchange of ideas advance mutual goals and facilitate individual growth.

Compassion

The willingness to be engaged with the needs of others.

Diversity

An awareness of the dignity of all, regardless of culture, race, ethnicity, gender, religion, sexual orientation, physical ability, socioeconomic status, or individual life experiences.

Excellence

The commitment to exceed expectations in education.

Service

Through active service, we support one another and seek to meet the needs of the larger community.

Innovation

Delivering new and creative ways to provide healthcare education while consistently

demonstrating compassion, integrity, and excellence.

Services Provided by Wellness Center

The Mental Health and Wellness Center provides counseling services to students and their immediate family members free of charge. Referrals to off-campus providers are made as needed. The Mental Health and Wellness Center provides the following:

- Individual Counseling: Medical school can be stressful and challenging, academically, socially, and emotionally. Many common concerns that are addressed include anxiety, stress management, depression, interpersonal issues, relationship concerns, or any other issues that may contribute to the student's academic and personal growth.
- Couple's Counseling: We welcome the opportunity to meet the medical student's significant other. We are able to help discuss concerns that may arise regarding their relationship. The journey through medical school can be overwhelming and taxing on the development and maintenance of relationships and their families. We strive to help in any aspect of the students' lives. We help work towards avoiding the most common pitfalls and arguments that couples' have and build robust support systems and new communication habits.
- Group Counseling: Group meetings will be held throughout the year. Places, topics, and times will vary and will be posted/announced.
- Lunch and Learn Discussions (Colorado) and Let's Talk Sessions (Utah): These are group discussions that are held throughout the school year. Times and dates will vary but will be displayed on the Student Activities calendar as well as the TV monitor and bulletin boards. This is an open to any and all students and is viewed as an open discussion regarding concerns that students are currently dealing with. Depending on the time of day refreshments may be served. This group allows students to have an open dialogue with their peers to develop ideas and strategies to overcome common issues.

Wellness Wheel

Wellness is more than taking a break from the rigors of medical school. It is finding a balance between intellectual learning and the other wellness categories in an effort to increase one's quality of life. There are 7 Wellness Categories that RVU

Student Affairs strives to educate, engage and embed in the medical student experience.



Physical Wellness – promotes proper care of our bodies for optimal health and functioning including physical activity, nutrition and mental well-being.

Intellectual Wellness – promotes a stimulating and successful life by expanding knowledge and skills through the integration of scholastic, cultural and community activities.

Emotional Wellness – inspires self-care, relaxation, stress reduction and the development of inner strength.

Spiritual Wellness – is the integration of meaning and purpose into one's life through

connectedness with self, others, art, music, literature, nature or a greater power.

Social Wellness – involves interacting with people using good communication skills, having meaningful relationships, respecting oneself and others, and creating a support system.

Environmental Wellness – inspires us to live a lifestyle that respects our surroundings, is in harmony with the Earth and promotes interaction with nature.

Occupational Wellness – includes career exploration and achieving balance between work with its stressors and relationships and leisure time.

Financial Wellness – is the process of learning how to successfully manage financial expenses and being prepared to manage financial changes.

Supporting Student Medical Leave

- A student does not have to be in counseling to request a medical leave of absence. Mental Health and Wellness staff support student medical leave from the COM when significant psychological problems or personal concerns have disrupted a student's ability to function academically. The decision to grant a medical leave is ultimately the function of the Dean.
- Mental Health and Wellness staff will document their support of a student's medical leave in the student's counseling file. Only with the student's written permission, will any information be shared by the Mental Health and Wellness

Center.

- Whenever appropriate, Mental Health and Wellness Center may recommend that a student who is granted a medical leave participate in counseling with a licensed mental health professional before returning to the COM. The student may be asked by the Dean to provide evidence of having successfully completed treatment when requesting to return to the COM from a medical leave of absence. The above information will be shared with the student by the Dean before the student is granted a medical leave of absence.

24/7 Mental Health Hotline

We are pleased to provide RVU students free, confidential access to a professional counselor 24/7 through StudentLinc. Students can speak to a professional counselor to discuss stress associated with school, learning how to balance work and personal life, and financial matters.

For access to a professional counselor please call: **1-888-893-LINC (5462)**

Scheduling a Counseling Appointment

RVU students may make appointments to see the counselor by going to the RVU Counseling Centers' Web page of Student Affairs. Clicking on the link will take the student to the Acuity Appointment Scheduling System. Students may also schedule an appointment through the front desk Administrative Assistant and/or by e-mailing the counselor directly. RVU prides itself with an open door policy.

If a student feels the need to be seen immediately they can go to the counselor's office and if the counselor is not busy the student can be seen. The Acuity Appointment Scheduling System is completely confidential. Only the Mental Health and Wellness Center staff have access to the appointment data.

Services to Imminently Dangerous Students

- In managing cases where danger to a student and/or client or someone else is potentially imminent, Mental Health and Wellness Center staff will do whatever is necessary to minimize the danger. This will include consultation with other professional colleagues such as the Dean, Associate Dean, Security, and Assistant Dean, etc., as deemed necessary. Law enforcement will be notified should the situation demand such intervention or otherwise stated by law.
- Regarding professional ethics and legal requirements, the safety of students and others takes priority over maintaining the confidentiality of students

and/or clients. In the event of having to disclose confidential information regarding a student and/or client, only information necessary to maintain safety will be disclosed. The information will only be disclosed to persons in a position to make appropriate use of the information.

- In most situations, the Student Affairs Assistant Dean and the families of the suicidal student and/or client or dangerous student and/or client will be notified of the situation so that they can provide support and help in making decisions about the student and/or client. The reasons for notifying or not notifying the Assistant Dean and families in these situations will be documented in student's and/or client's files. The Assistant Dean will contact families of suicidal or dangerous students and/or clients unless the counselor involved has a previous relationship with the family.
- Thorough documentation will be made of all steps taken to stabilize the situation.
- Counselors will follow the appropriate protocols of the University and by law when a student and/or a client has made a serious suicide attempt or self-harm attempt.
- Counselors will follow the appropriate protocols of the University and by law when a student and/or a client presents a danger to others.

Supporting Special Accommodations for Students

- Any formal academic accommodations arranged for students with learning disabilities, attention deficit hyperactivity disorder, or psychological disabilities are the responsibility of the Educational and Academic Support Counselor. Mental Health and Wellness staff working with a student who might require such accommodations will refer the student to the Educational and Academic Support Counselor, where the implementation of any accommodations may occur.
- This allows for the possibility that Mental Health and Wellness staff may on some occasions contact faculty on a student's behalf requesting flexibility as a student seeks to make up work missed due to personal problems. Such requests do not carry the weight of the federal law, and are distant from the academic accommodations that students with disabilities may require. Counselors will contact faculty members on the student's behalf only when they have an ongoing relationship with the student. An ongoing relationship is defined as at least three counseling sessions in a semester, with the last session occurring within two weeks prior to the student's request to contact faculty on the student's behalf. The student must provide written permission specifying the faculty member(s) to be contacted via a signed Release of

Information form. Contact will be limited to counselors' assessment of the student's current level of functioning.

- Mental Health and Wellness Center does not provide psychological assessments for diagnosing learning disabilities or attention deficit disorders, only support with documentation. Students seeking such services will be referred to the Educational and Academic Support Counselor for guidance.

Mandated Counseling Services

Genuine counseling often requires voluntary engagement on the part of the student and/or client. Mandated counseling is largely untenable. There are instances when a mandated session is required for evaluation. There are situations that a mandated session can prove to be very beneficial. First, because there are occasions when it is prudent to require a student and /or client to undergo an evaluation to determine whether or not the student and/or client is a danger to themselves or others. Second, a mandated evaluation may be required to determine whether or not the student and/or client is gravely disabled.

On occasion a mandated session can lead to a series of voluntary counseling sessions. Mandated psychological evaluations should be considered a last resort. If the Mental Health and Wellness Center becomes a place where students perceive that they are required to come for treatment the main goal of providing voluntary services will become fundamentally undermined.

Circumstances under which mandated counseling services does and does not occur by Mental Health and Wellness Center:

- Mental Health and Wellness Center does not provide services to students and/or clients whom are mandated to receive mental health services by a court of law. Students that are court ordered to seek counseling will be referred to an outside professional in the community.
- Mental Health and Wellness Center will only provide a mandated evaluation for a student and/or client whom has been referred by the Dean or Assistant Dean.
- Mental Health and Wellness Center should be able to complete a mandated session within one session. The exception to this might be when a student returns from a "Medical Leave of Absence" due to suicide attempt, danger to others, and/or hospitalization due to mental health reasons. The Dean can mandate the student to participate in counseling services to continue to evaluate their mental health status. This may go on for a period of several sessions but no longer than a semester.
- Mental Health and Wellness Center will only see mandated cases for which the counselor has the expertise to offer such services. Examples of cases for which the Mental Health and Wellness Center cannot provide competent

services would include those that require an expertise in forensic psychology or drug and alcohol assessments. The Mental Health and Wellness counselor will work with the community to identify a workable outside referral resource.

Communication between Mental Health and Wellness Counselor and others in counseling students

- Mental Health and Wellness Center counselor will only provide information relating to the students' mandated counseling if the student provides written permission to share the counseling information. The only exception would be if the student and/or client presents a danger to themselves or others or appears to be gravely disabled. Students who decline to give written permission to allow the counselor to share information about their mandated counseling could face possible consequences from the Dean.
- When students give written permission to the Mental Health and Wellness staff to relay information regarding their mandated counseling to the Dean, the only information the Dean may request is 1) the students' attendance of counseling session (s) and 2) information directly related to the students' reason for mandated counseling, that being the student is a danger to themselves and/or others and, gravely disabled. This does not preclude the possibility of the Dean, students and the Mental Health and Wellness staff agreeing that other pertinent information can be released, but the Dean does not implement sanctions based on students' decision to allow or not allow the release of such information.
- Any communication between Mental Health and Wellness Center staff and Deans about students' mandated counseling sessions will also involve the student in question. If the communication is a face to face meeting with the Dean, it will also include the student. If the communication takes the form of a telephone call, the call will be made in front of the student on speaker phone. If the communication is in the form of e-mail or memorandum it must be reviewed in advance by the student and/or copied to the student.

Alternatives for students mandated to participate in counseling

Any students mandated by the Dean to participate in counseling session (s) are also afforded the alternative of seeking outside counseling in the community from a licensed mental health professional.

Dissemination of this policy to students

A copy of this policy is provided by the Mental Health and Wellness Center staff to all students that are in mandated counseling session (s).

Summer Services (between semesters)

- Mental Health and Wellness Counseling Services will be open during the same office hours as through the Fall and Spring Semester. The same hours of services will apply.
- Ongoing counseling services will only be provided to students who meet the following criteria:
 - Students must be enrolled for the following fall semester.
 - Students must have psychological concerns that can be adequately addressed within the limited framework of services available during the summer (i.e., no availability of medical support via Health Services, or availability of after-hours crisis coverage via Mental Health and Wellness Counseling Services by phone, etc.).
 - StudentLinc will be available throughout the summer as it is throughout the Fall and Spring semester. RVUCOM-SU students will be provided free, confidential access to a professional counselor 24/7. Students can speak to a professional therapist to discuss stress associated with school, learning how to balance their personal life, and financial matters.
For access to a professional therapist please call: **1-888-LINC (5462)**

Skype-based Counseling

- Counselors have the technical capability of using Skype to communicate with students when the student is off campus.
- These sessions will occur during regular counseling business hours.
- Mental Health and Wellness Center counselors' are governed by the code of laws regarding the use of Skype within the scope of the counselors' license.
- There is no guarantee of confidentiality with any form of electronic use.
- Counselors' will document all Skype sessions as if they were face to face sessions.

Ethical Standards and Confidentiality

- Mental Health and Wellness Counseling Services' professional staff adhere to the ethical standards of their respective professions: American Association of Marriage and Family Therapists (AAMFT) and the American Counseling

Association (ACA).

- Mental Health and Wellness Counseling Services maintains ethical standards to the confidentiality of services. The standard from AAMFT "Code of Ethics" relating to PRIVACY AND CONFIDENTIALITY serves as a general standard for all Mental Health and Wellness' professional staff and associates.

4980.55. Disclosure of Counselor's Qualifications.

As a model for all therapeutic professions and to acknowledge respect and regard for the consuming public, all licensed marriage and family therapists are encouraged to provide to each client, at an appropriate time and within the context of the psychotherapeutic relationship, an accurate and informative statement of the therapist's experience, education, specialties, professional orientation, and any other information deemed appropriate by licensee.

Documentation of Services and Clinical Files

- All counseling services provided to students by the Mental Health and Wellness Center will be documented. All documentation will be kept and filed in a student clinical counseling file. "Hard" copies of such files will be placed in the student files as soon as documentation is available. There are no electronic files kept on students at this point.
- All "hard copy" documentation of services and other confidential information will be kept in a filing cabinets locked in Mental Health and Counseling Center's office. No student files will be removed from the premises, unless required by court order or some other extraordinary circumstances.
- Students will complete the **Student Information Form** at the time of their first session each academic year.
- If appropriate, and the student agrees, will read and sign the **Release of Information Form** for appropriate information being requested.
- **Progress Notes** will be completed within 24 hours of services. Progress notes will include Observation of student, Intervention, Assessment, and Plan for future services.
- **Documentation of couple's counseling** in each student's individual file. References to a student's intimate partner in such documentation should be limited to a non-specific neutral term (i.e. "partner", "girlfriend," etc.) or to the significant other's first name, so that the significant other's identity will maintain some degree of confidentiality in the event the student's treatment documentation is released (i.e. court order, or by some other appropriate means).

- **Missed, canceled, or rescheduled appointments** will require a brief note by the counselor indicating what transpired to have missed, canceled, or rescheduled the appointment and this and any other correspondence may substitute for the note documenting the missed, canceled, or rescheduled appointment. Any other services that are provided such as an emergency or after hours will be completed as soon as possible using the “Progress Note” form.
- The student’s **Permission to Release Information** will be signed by the student and the original form be kept in the student’s counseling file.
- Any correspondence such as e-mail, messages etc., with or about the student will be included in the student’s counseling file.
- All documentation of services completed by counselors will include the signature of the counselor’s name, degree, and professional licensure.
- Clinical files will be organized in chronological order such as the most recent documents will appear on top.
- In keeping with Utah and Colorado laws, “hard copies” of documentation of services will be shredded or otherwise destroyed approximately seven years after the student in question graduates or otherwise leaves the COM.

CARE Team

The CARE (*Campus Assessment Response and Education*) Team is a cross-functional team that assesses, refers and/or responds to students identified as demonstrating emotional distress in a coordinated and comprehensive manner with dignity and respect, to help them succeed and to ensure the safety of the university community as a whole.

Team members include:

- Assistant Dean for Student Affairs
- Mental Health and Wellness Counselor
- Public Safety and Security Supervisor
- Faculty Phase Director
- Director of Campus Operations

The CARE Team’s primary purpose is to make sure students are emotionally well enough to function academically and are safe to be on campus. This is accomplished by helping students connect with professional care providers in order to resolve behavioral and emotional difficulties. Toward that end, the CARE Team refers to action guidelines. The particular action taken in an individual situation

depends upon the circumstances of that student's condition and the severity of the situation. The team will meet regularly to discuss student concerns.

Anyone concerned about the overall safety or mental health of a student and would like the college to follow-up can make a referral by completing the [online referral form](#).

Off-Campus Mental Health Resources

- StudentLinc - 24-Hour Hotline service to help students resolve personal issues that may impact academic performance and cause personal distress. Students can speak with a licensed counselor and they will provide initial support and assessment. Call (888) 893-5462.
- Turning Leaf - As a state licensed corporation, TurningLeaf Wellness Center offers wellness services ranging from Mental Health and Substance Abuse Treatment to Seminars and Personal Coaching, to Mind and Body Wellness programs. Depending on the concern, students will be referred to one of their licensed therapists. For additional information, visit their [website](#) or call (435) 652-1202.
- Intermountain Psychiatry & Counseling - Specialty clinic providing care for psychiatric and behavioral health need, including depression, anxiety, adult and pediatric ADHD, eating disorders, autism and Asperger's, bipolar disorder, and more. All available treatment options are discussed such as medications, healthy thinking and lifestyle changes, psychotherapy, and alternative remedies. For additional information, visit their [website](#) or call (435) 688-4850.
- Doctors Volunteer Clinic - Free medical and mental health services offered to the local community. For additional information, visit their [website](#) or call (435) 656-0022.
- Psychology Today - Find a licensed therapist or psychiatrist in your area and learn about them before scheduling an appointment! To locate a provider in the local area, visit their [website](#).
- Dove Center - Supporting individuals of domestic violence and sexual assault through education and resources to increase safety and promote healing from trauma. Provides confidentiality and shelter, outreach services, and 24-hour helpline. For additional information, visit their [website](#) or call (435) 628-0458.
- 24-Hour Rape Crisis Hotline - (888) 421-1100

- Utah Suicide Hotline - (801) 625-3700

Mental Wellness Events & Fatigue Mitigation


Various programming activities and events have been created to address student mental health and wellness and to mitigate fatigue. In addition to a wide variety of student life activities, the Mental Health & Wellness Office has put the following activities in place with a goal of information sharing and promoting mental wellness:

- Couples Night - "Meet your new Family Member." This workshop conducted by Devon Nixon from Turning Leaf focuses on the strains which attending medical school can have on a relationship and how spouses/partners need to realize that it is similar to welcoming a new "family member" into the home with their demands on time and resources.
- Couples Night - Empowering your Relationship. Similar to the fall semester event, this evening workshop focused on dealing with the pressures of medical school and how a spouse/partner could support their student. Included a "Dating Game" activity.
- Let's Talk Series - Students are invited to join Dr. Harmon for a free-flowing dialogue on what issues they were encountering and to share ideas on how to respond to them productively.
- Setting up a table with Mental Health Resources - Dr. Harmon regularly sets up a table with snacks and mental health resources to correspond with the conclusion of an exam. This is well received as students stop by on their way to their next activity.
- Therapy Dogs - On a weekly basis, dogs have been visiting campus during the noon hour for students to pet between classes. Trained dogs were also invited to campus to run obstacle courses on the lawn east of campus.
- Additional programming includes regular yoga, mindfulness meditation and training, and de-stress events prior to major exams.
- Weekly "Wellness Wednesday" post on the RVU-SU facebook page. Various aspects of mental health are emphasized.
- Monthly Newsletter. The Mental Health and Wellness Office publishes a newsletter called "Positive Pulse" which includes a variety of tips and article summaries to help students become more aware of self-help ideas and issues relating to mental wellness.

Forms and Handouts (available in hard-copy format)

- Student Information (Utah) Form Student information (Colorado) Form
- Authorization For Release of Information Form
- Progress Note Form

- Disclosure of Counselor's Qualifications (Utah)
- Disclosure of Counselor's Qualifications (Colorado)
- Care Team Submit Referral Form
- Consent for Services Form
- Student Satisfaction Survey Form
- Student Satisfaction Survey Form-Empower the Relationship Event
- Mandated Services at RVUCOM-SU Mental Health and Wellness Center-Handout



STUDENT NAME	
DATE OF BIRTH	

PROGRESS NOTES



AUTHORIZATION FOR RELEASE OF INFORMATION

STUDENT NAME _____ DOB _____ SS# _____

I give permission to release information pertaining to myself.

FROM Rocky Vista University-SU TO _____
 (Organization) (Organization)

Attention: Kathy Kilian-Hamon, LMFT _____
 (Person) (Person)

255 East Center _____
 (Address) (Address)

hins, UT 84738 _____
 (City/State/Zip) (City/State/Zip)

435-222-1257 _____
 (Phone) (Phone)

I UNDERSTAND THAT APPROPRIATE INFORMATION FROM MY CLINICAL RECORD MAY BE RELEASED VIA FACSIMILE WHEN NEEDED FOR IMMEDIATE CLIENT CARE (AS DEFINED IN CLINICAL POLICIES 3.3.10 AND 3.2.14).

I UNDERSTAND THIS RECORD MAY CONTAIN MENTAL HEALTH, DRUG AND/OR ALCOHOL USE/ABUSE HISTORY, HIV, AIDS OR ARC INFORMATION, AS APPLICABLE TO MYSELF.

The PURPOSE for the release of this information is [] Continuity of Care
Other (specify) _____

SPECIFIC RECORDS/INFORMATION TO BE RELEASED FOR THE TIME PERIOD FROM _____ TO _____

[] Assessments [] Psychiatric / Psychological Evaluations [] Discharge Summaries [] Progress Notes
Other (specify) _____

This authorization will expire on the following date _____, or on the following event/condition _____
This authorization will last no longer than reasonably necessary to serve the purpose for which it is given. I understand that I may withdraw this authorization at any time, unless action has already been taken based on this authorization. RVU will not condition treatment, payment, or program eligibility on the signing of this authorization but I understand that in certain limited circumstances I may be denied treatment if I do not sign this form.

I have read, or have had read to me, this authorization form and understand what it means.

Client / Parent / Guardian Signature Relationship Date or Person Authorized to Sign in Lieu of Client

Witness to the Above Signature

This information has been disclosed to you from records whose confidentiality is protected by Federal regulations which prohibit you from making any further disclosure of it without the specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for the release of medical or other information is not sufficient for this purpose. FURTHER DISCLOSURE OF THIS INFORMATION IS PROHIBITED UNLESS OTHERWISE PERMITTED BY FEDERAL AND STATE LAWS. (P.A. 258 of 1974, Section 748(3); P.A. 366 of 1978; 42 CFR Part 2; 45 CFR Parts 160 and 164 (HIPAA); P.A. Act 488 of 1989)

Distribution: Original to Person Releasing the Information, Copy to Requestor



STUDENT INFORMATION

STUDENT'S NAME	
CURRENT ADDRESS	
PREFERRED PHONE	
PERMANENT ADDRESS	
ALTERNATE PHONE	
PREFERRED EMAIL	
DATE OF BIRTH	
CURRENT AGE	
GENDER	
SOCIAL SECURITY NUMBER	
RVU CLASS YEAR	
PRIMARY EMERGENCY CONTACT	
RELATIONSHIP	
PREFERRED PHONE	
ALTERNATE PHONE	
SECONDARY EMERGENCY CONTACT	
RELATIONSHIP	
PREFERRED PHONE	
ALTERNATE PHONE	

RVU-SU Student Referral Form

Please use this form to identify any student you have identified with emotional, social, or behavior concerns. Your personal information is not required but may be helpful if the CARE team needs more information.

* Required

Your name

Your answer

Your Email

Your answer

Your phone number

Your answer

Relationship to Student

Your answer

Who are you referring? 

Name of Student *



RVUCOM-SU

Request for Student Withdrawal or Leave of Absence Form

Name _____ Date _____

Student ID Number _____ Complete Withdrawal Leave of Absence

Briefly describe reason(s) for requesting Complete Withdrawal or Leave of Absence (Attach additional explanation or documentation if needed):

If Leave of Absence - Proposed Effective Date _____ Return Date _____

For Official Use Only (Approval only required if Leave of Absence)

Recommendation by Assistant Dean for Student Affairs: Approve Deny

Name: _____ Signature: _____

Decision by Campus Dean: Approve Deny

Name: _____ Signature: _____

Please note the following additional conditions & requirements:

- Before exiting, please clean out assigned locker and return all RVU property, including library books and other supplies. Locks, identification card and parking permit (for withdrawals need to be returned to Security. Failure to do so will result in additional charges and a hold on your academic records.
- If staying in Crimson Cliffs Housing, a separate exit form is required. (see Housing Coordinator)
- After the effective date you will no longer have access to RVU Online, including your assigned RVU E-mail address, MyVista, curriculum resources, etc. Back up any information that you would still like to have access to prior to the effective date.
- It is your responsibility to contact the Financial Services Office and take care of any financial obligations.
- You are responsible for your academic progress, including requesting incomplete grades, arranging with the registrar to re-enroll in classes, and contacting the Assistant Dean for Student Affairs if your plans change. Please provide a non-RVU e-mail address for future correspondence.

Document 5.3.L

Mental Health Counseling and Physician Health Program

Student Handbook and Catalog 2018-2019

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[Link](#) to Student Handbook and Catalog 2018-2019

Linotype, or Bell MT. If none of these choices are available, similar font options will be considered and must be approved by the Marketing Department.

- Additionally, if any of these phrases are used, they must be one of the six official colors (listed above).
- If using RVU, RVUPA, MSBS, RVUCOM, they must be in all caps.
- When using RVU abbreviation, COM or PA must also be abbreviated. Likewise, when writing out "Rocky Vista University" in full, "College of Osteopathic Medicine" or "Physician Assistant Program" must also be written out in full.

Mental Health Counseling

All students have access to a variety of mental health services, including individual and couples counseling, workshops, and 24/7 psychiatric services. Information is maintained and posted in the Office of Student Affairs and is listed on the RVU website and other strategic locations throughout the campus. Mental Health Counseling is available for students and their families through the Office of Student Affairs at no cost. When receiving services outside of the University, the individual student and his/her personal health insurance are responsible for all fees that are incurred through the utilization of such services.

Colorado Physician Health Program

(303) 860-0122;
899 Logan Street, Suite 410, Denver, CO

The Colorado Physician Health Program (CPHP) is a nonprofit organization, independent of other medical organizations and the government. CPHP provides the peer assistance services for licensed physicians and physician assistants of Colorado. CPHP also has training program contracts to serve Resident, Medical Students and Physician Assistant Students. CPHP clients have assured confidentiality as required by law or regulation. Peer assistance services aid individuals who have any problems that would affect ones' health such as emotional, psychological or medical problems. For example, CPHP assists its clients with medical and/or psychiatric conditions (e.g. Alzheimer's disease, HIV infection, depression or substance abuse) as well as psychosocial conditions (e.g. family problems or stress related to work or professional liability difficulties). CPHP provides diagnostic evaluation, treatment referral, as well as treatment monitoring and support services. CPHP believes that early intervention and evaluation offer the best opportunity for a successful outcome and preventing the health condition from needlessly interfering with medical practice.

StudentLinc

StudentLinc is a service that provides all RVU students free, confidential access to a professional counselor 24 hours a day, 7 days a week. Students can speak to a professional counselor to discuss stress associated with school, problems with balancing work and personal life, financial matters, and any other issue. They are available by calling 1-888-893-LINC (5462).

Office of Testing

The Office of Testing (or commonly referred to as OOT) is in charge of preparing, administering, and scoring all written exams, quizzes, and rubrics-scored essay assignments, providing score reports to faculty, and administering post-exam reviews. The OOT is available to answer student questions about testing, arrange make-up exams, and reviews for excused absences, and work with the Directors of Preclinical Education, Program Directors, Deans, and Course Directors to ensure the quality and security of evaluation material.

RVU takes academic integrity very seriously, and the OOT designs the proctoring and administration of exams. With student cooperation, we provide the most secure, consistent, distraction-free exam environment possible.

Print Center

The Print Center streamlines the University's print needs. It reduces outsourcing and incorporates additional services (including business card production, poster printing, lamination, binding, and many more services). RVU departments and students are able to send their print jobs directly to the Print Center, using an online system, and pick them up at their convenience.

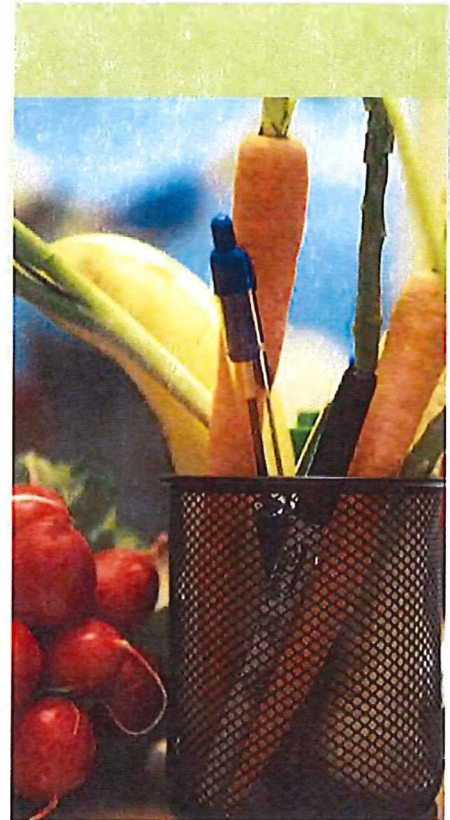
The Print Center is located at the Colorado campus on the second floor, inside the library and is open Monday through Friday from 9:00 am to 4:30 pm MST. RVUCOM-SU print jobs are processed and then shipped to the Utah campus. The website for ordering prints is <https://printcenter.rvu.edu>. The Print Center Administrator may be contacted through email at printcenter@rvu.edu.

Student Portal (MyVista)

Students are provided access to the MyVista Student Portal upon acceptance. MyVista provides students with access to unofficial transcripts, the academic calendar, the ability to add and drop courses, run a degree audit, view financial informa-

Employee Mental and Physical Health Resources

[Link](#) to Employee Benefits and Resources.



Wellness Plan

Purpose

To promote health and wellness to our employees by fostering healthy lifestyles and advocating for a healthy work environment.

Goals

Promote mindfulness towards personal health and/or wellness

Motivate individuals so that they may make health and/or wellness lifestyle choices.

Promote guidelines that will enable individuals to achieve their own health and/or wellness goals.

Provide tools of motivation to increase the culture of Rocky Vista University to appreciate the importance of health and/or wellness choices in its many forms.

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EXECUTIVE SUMMARY

Nearly 400 peer-reviewed studies have shown that employee wellness programs foster healthy behavior, enrich one's knowledge in order to live a healthy lifestyle and improve underlying health conditions. Research has demonstrated that modifying one's lifestyle is often more effective than relying on medical intervention. It has been shown that employee wellness programs reduce absentee rates, lower medical costs and produce a positive return on investment. (www.worksitewellnessinfo.com). Whatever the motivation, now is the opportune time for Rocky Vista University (RVU) to invest in health promotion on campus and off.

The aim of the Wellness Program is simple, make people healthier. The Wellness Plan will be open to full and part-time faculty and staff and their supporting other. The Plan will focus on physical and mental wellbeing and will utilize a number of approaches to achieve its goals.

Because the word health can mean so many different things, the Program will concentrate on key areas. Physical and emotional wellbeing will be at the forefront of the cause.

The Committee will concentrate on utilizing paid time off as incentive, instead of nominal monetary prizes. A points and incentives system is listed below. Through education, on-site activities and team building experiences, the Committee hopes to foster an environment where happiness and health lives and breathes through the walls of the University.

FOCUS AND SCOPE

Through education, planned activities and employee assistance the Committee hopes to promote a culture of health. The scope of the committee is to establish programs and incentives that serve the purpose and accomplish the goals set forth by the Program. The Committee will also be charged with continually exploring options that will enhance the effectiveness of the Program.

A variety of educational opportunities may be offered on several topics. Topics will vary according to demand, time of year and in correlation with challenges. Topics may be presented in the form of on-site speakers, on-site trainers, flyers, posters, newsletters and email.

Planned activities will vary greatly. A sample list of events has been compiled and is listed under the Points and Incentives section of this Plan. Activities will range from small stress management challenges such as watching a comedy movie, to large-scale planned physical challenges such as a weight-loss and exercise competitions.

BUDGET ALLOCATION

The Committee will review budget needs each year and could allocate its budget as follows:

Category	Details
Incentives	Monetary awards and small prizes
Speakers	Educational classes
Supplies	Various office supplies, bulletin board, challenge supplies such as pedometers or fruit

MARETING

Many reports have shown that a home grown wellness program is the key to success. By involving our constituents in all phases of the Program, and listening to feedback that they provide, the Committee anticipates a greater involvement. A grass-roots approach will allow the Committee to really get to know the needs of our population and build trust. Members of the ~~Committee~~ will be available to spend time speaking to folks individually regarding the Program and offer members of the RVU community a chance to share their knowledge.

POINTS AND INCENTIVES

The plan will center around a point system and will award various incentives according to point accumulation. A committee member will track point accumulation manually. Points will be earned by attending and participating in various activities, challenges and events. For every 100 points earned, the participant will earn one wellness day. Additionally, for every 50 points earned, the participant will earn half of a wellness day. Earned paid time off will be capped at three total days per year and wellness days will not carry over to the following calendar year. A large portion of prizes will be given in the form of wellness days. Other incentives such as gift certificates, small gifts could also be incorporated as the Committee sees fit.

CHALLENGES

Challenges are meant to keep interest in the program and provide different activities that are easy to maintain since they will last for short periods of time, quarterly or on going. There could also be mini-challenges spread throughout the year.

Below is a chart that details possible challenges. It is not meant to be all inclusive and each event would require a planning process. These are rough ideas and are subject to change and approval.

Challenge	Description	Duration	Award
Donate Blood	Donate Blood at your chosen location to receive points	Ongoing	10 points per donation
Hiking Club	Go on a lunch time hike with your co-workers	One quarter	5 points per week
New Year's Resolution	Employees choose to enroll in either a weight loss or exercise challenge. Points will be awarded for losing weight or for hours exercised.	12 weeks	10 points per pound lost. 1 point for every hour exercised
Water Intake Challenge	Drink half your body weight in ounces. For instance: 160 pounds = 80 ounces in water.	30 days	1 point per day
Lunch/Learn	Attend an organized Wellness Lunch/Learn	Quarterly	5 points per lunch/learn

5K Challenge	Participate in a organized 5K	Quarterly	30 points
Stair Challenge	Twice a week, employees will be challenged to walk the stairs for 15 minutes at work.	Quarterly	1 point per stair climb.

ASSESSMENT PROGRAM EFFECTIVENESS

The Wellness Plan will not become static, but will change along with the needs of its constituents. Evaluation data will be collected throughout and periodic needs assessment surveys will be conducted. Assessment will examine both how well the Program is working (process assessment) and whether or not it is achieving expected results (outcome assessment).

Process assessment, such as participation and evaluation of individual activities will answer many of the questions about the basic operation of the Program. Process assessment will incorporate informal feedback, formal feedback in the form of surveys and committee discussion.

Outcome assessment will center on specific program goals. For example, in a weight-loss challenge, the actual percentage of weight loss will be calculated. Baseline data will be gathered in order to quantify what change has taken place over a period of time.

Both outcome and process assessment will be utilized in determining program costs and in what areas, specifically the money, should be placed.

Document 5.3.N

Life Assistance Plan- Available to All Employees

Regardless of Insurance

[Link](#) to Document on internal webpage

Life Assistance Program
24/7



Life Assistance Program



Life Assistance Program

Self-service support – at your fingertips.

Educational materials on work/life topics such as caregiving, daily living and working smarter are available online, including a savings center and relocation center.

Extra flexibility. For assistance with your search, we can email you. Include your email address when you request support via the web. It's just one more way for us to meet your needs.

Call us any time, any day or go online for confidential assistance, information or resources to help resolve life's challenges.



¹ Some Healthy Rewards programs are not available in all states. If your CIGNA plan includes coverage for any of these services, this program is in addition to, not instead of, your plan benefits. A discount program is NOT insurance, and you must pay the entire discounted charge.

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Whatever life throws
at you – throw it
our way.



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Life.

Just when you think you have it figured out, along comes a challenge. But whether those challenges are big or small, your Life Assistance & Work/Life Support Program is available to help you and your family find a solution and restore your peace of mind.

Call us any time, any day. We're just a phone call away whenever you need us – at no cost to you. An advocate is ready to help assess your needs and develop a solution to help resolve your concerns. He or she can also direct you to an array of resources in your community and online tools.

Visit a specialist. For face-to-face assistance, you have three sessions available to you and your household members. Call us to request a referral.

Reward yourself. Access your Healthy Rewards^{®1} amenities program for discounts on a range of health and wellness services and products from participating providers.

Achieve Work/Life Balance. Get extra support for handling life's demands. Call for a referral to a service in your community or advice on topics such as:

- **Legal consultation.** Receive a 30-minute free consultation and up to a 25 percent discount on select fees.
- **Parenting.** Receive guidance on child development, sibling rivalry, separation anxiety and much more.
- **Senior care.** Learn about challenges and solutions associated with caring for an aging loved one.
- **Child care.** Whether you need care all day or just after school, find a place that's right for your family.
- **Pet care.** From grooming to boarding to veterinary services, find what you need to care for your pet.
- **Temporary back-up care.** Don't let an unplanned event get the best of you – find back-up child care.

These are just a few examples of the support available to you. Call to get the assistance you need to help resolve life's challenges.

1.800.538.3543

Log in to www.Cignabehavioral.com/CGI

Click on the Healthy Rewards link to access discount information:
User name: **rewards**
Password: **savings**

Life Assistance Program
24/7



Call us or reach us online.
1.800.538.3543

www.Cignabehavioral.com/CGI

Click on the Healthy Rewards link to access discount information:

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