

2026

Annual Security Report



Allen College
UnityPoint Health

Allen College – UnityPoint Health

2026 ANNUAL SECURITY REPORT

Introduction

This report is provided in compliance with the Jeanne Clery Campus Safety Act. It provides students and employees of Allen College ("College") with information on: the College's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the College will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

Policy for Preparing the Annual Report

This report is prepared by the Executive Director, Business & Finance in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities and various other elements of the College. Each year an e-mail notification is sent to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Denise Hanson, Executive Director, Business & Finance, in person at 1950 Heath Street, Waterloo, IA; by mail at 1825 Logan Ave., Waterloo, IA 50703; or by email at Denise.Hanson@allencollege.edu. The College is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field and are constantly tested and re-evaluated for their effectiveness.

General Safety and Security Policies

Campus Security Personnel & Relationship with Local Law Enforcement

The UnityPoint Health – Waterloo Security Department is responsible for campus safety at the College.

The UnityPoint Health – Waterloo Security Department provides the security, crime prevention, and premises access on the College's campus 24 hours a day, seven days a week. The Security Department's jurisdiction covers all the institution's property which includes hospital and College facilities internally and externally, as well as hospital and College parking lots. The Security Department's officers have the authority to ask people for identification and to determine whether individuals

have lawful business on the institution's property. They also have the authority to issue parking citations, carry firearms, and make arrests when criminal behavior occurs.

While the College does not have any written agreements with local law enforcement agencies, it does maintain a close working relationship with local police.

Campus Security Authorities

The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

- Safety & Security Manager at (319) 235-3869
- Executive Director, Business & Finance at (319) 226-2012 or (319) 610-4405
- President at (319) 226-2011
- Dean - Enrollment Management at (319) 226-2004
- Dean - School of Nursing at (319) 226-2044
- Dean - School of Health Sciences at (319) 226-2031

Reporting a Crime or Emergency

The College encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the College, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged when the victim of a crime elects to, or is unable to, make such a report.

Situations that pose imminent danger or a crime in progress should be reported to local law enforcement by calling 9-911 or 911 from any campus phone or any cell phone. Keep in mind that the individual making the call from a cell phone will need to provide the address where the emergency has occurred. To assist this effort internally, emergency signage with building, classroom/area and address information is posted throughout the facilities.

Students, staff, and visitors should report criminal actions, accidents, injuries, or other emergency incidents to one of the campus security authorities identified above. Once reported, the individual making the report will be encouraged to report it to appropriate police agencies. If requested, a College staff member will assist a student in making the report to the police.

Anonymous incident reports can also be made via telephone, postal mail or emailed to the Executive Director of Business & Finance at (319) 226-2012; 1825 Logan Avenue, Waterloo, IA, 50703; or Denise.Hanson@allencollege.edu respectively.

Confidential Reporting

The College will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the College's Sexual Harassment Policy, when an employee becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the College disciplinary system, or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the College without revealing the victim's identity. Such a confidential report complies with the victim's wishes but still helps the College take appropriate steps to ensure the future safety of the victim and others. With such information, the College can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the College.

The College encourages its professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics. The College does not have pastoral counselors.

Security of and Access to Campus Facilities

Access to the buildings is allowed for faculty/staff members, hospital employees, students, and visitors. The security officers also perform vehicle patrols of parking lots and surrounding areas.

The Allen College campus has badge access to its facility. All academic buildings are secured during the evenings and weekends. Winter Hall is generally open to the public/visitors between 8 a.m. – 4 p.m. Monday – Friday, excluding holidays and posted closures. However, building hours may vary with class schedules and special events. Gerard Hall and Barrett Forum are accessible to visitors by entering through Winter Hall. Students, faculty, and staff have badge access to McElroy Hall, Gerard Hall, and Barrett Forum during the hours we are open to the public and/or open for classes. All buildings are locked and secured via a monitored alarm system during non-business hours, which is generally after 8 p.m. Monday through Thursday and 5 p.m. on Friday or when classes end, whichever is earlier. The Doctor of Physical Therapy program (DPT) space is located on the fifth floor of UnityPoint Health – Allen Hospital. This space is accessible daily from 5 a.m. – 10 p.m. with appropriate Allen ID badge for faculty, staff and DPT students. The Barrett Forum computer lab is open seven days a week, 24 hours a day, but access is only available with a current and active student ID badge. Parking lots for all buildings are well lit and

patrolled by security. Security patrols are provided on foot and by vehicle. Both buildings and the parking lots are equipped with security surveillance cameras.

Students and employees are asked to be alert and to not circumvent practices and procedures that are meant to preserve their safety and that of others:

- Do not prop doors open or allow strangers into campus buildings that have been secured.
- Do not lend keys or access cards to non-students and do not leave them unattended.
- Do not give access codes to anyone who does not belong to the campus community.

Keys to the offices, laboratories, and classrooms on campus will be issued to employees only as needed and after receiving the proper authorization. Faculty and staff in each department are responsible for assuring his/her area is secured and locked.

Faculty, staff, and student employees must adhere to policies regarding unauthorized access to school facilities, theft of, or damage to, school property, or other criminal activity. In particular, rendering inoperable or abusing any fire prevention or detection equipment is prohibited. Violation of these policies may lead to disciplinary action, up to and including termination and the filing of charges with law enforcement authorities.

Employee and student identification cards may be used to verify the identity of persons suspected of being in campus facilities without permission.

Security Considerations in the Maintenance of Facilities

The Executive Director of Business & Finance, the Business Coordinator, and the Security Department work with the Plant Services Department to identify needs on the campus when maintaining campus facilities. They do safety checks to identify street or safety lights that are not working, or shrubs or other landscaping that might need trimming. Custodial and maintenance personnel regularly check to ensure pathways are well lit and that egress lighting is working in hallways and stairwells.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

The College seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed on the following table.

Date	Event	Audience
Various (Upon Hire)	WLA Allen College Active Shooter Safety Resources: Cornerstone Module	New Allen College Faculty, Staff & Adjunct
Spring 2026	WLA Allen College Active Shooter Safety Resources: Cornerstone Module	All New and Returning Allen College Students
Summer 2026	WLA Allen College Active Shooter Safety Resources: Cornerstone Module	All New and Returning Allen College Students
Fall 2026	WLA Allen College Active Shooter Safety Resources: Cornerstone Module	All New and Returning Allen College Students
Fall 2026	WLA Allen College Active Shooter Safety Resources: Cornerstone Module	Allen College Faculty, Staff & Adjunct
Fall 2026	Safety & Security Training: UnityPoint Health – Waterloo Security Department	Allen College Faculty and Staff

Allen College offers Cornerstone modules which are online training courses that require a certain percentage for passing. These required modules for our students, faculty and staff relate to patient and personal safety, infection control, compliance, and many other topics in healthcare. The Cornerstone modules are required annually, and the student safety and security awareness modules are listed below. Self-defense courses are offered as needed on campus as well.

- WLA Clery Act Overview

Monitoring Off Campus Locations of Recognized Student Organizations

The College does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense

Upon written request, the College will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the College against a student who is the alleged perpetrator of such

crime or 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 the paragraph.

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

Drug and Alcohol Policy

The College is committed to creating and maintaining an environment that is free of alcohol abuse. The College, in compliance with the Drug-Free Schools and Communities Act, prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on College property or as part of any of its activities.

Furthermore, Allen College prohibits the unauthorized use, possession, or delivery of prescription drugs or medications in the work/school setting, and it enforces the state's underage drinking laws.

The College also enforces federal and state drug laws. The possession, sale, manufacture or distribution of illegal drugs is prohibited on campus or as any part of the College's activities. Violators of the College's policies or federal and state laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

Federal Drug Laws (updated 08.03.2026)

Denial of Federal Benefits (21 U.S.C. § 862) A federal drug conviction may result in the loss of federal benefits, including loans, grants, scholarships, contracts, and licenses, although the Department of Education has said it will no longer disqualify students from Title IV aid for a federal or state conviction for possession or sale of a controlled substance.

Forfeiture of Personal Property and Real Estate (21 U.S.C. § 853) Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation. A warrant of seizure may be issued and property seized at the time an individual is arrested on charges that may result in forfeiture.

Federal Drug Trafficking Penalties (21 U.S.C. § 841) Penalties for federal drug trafficking convictions vary according to the type and quantity of the controlled substance involved in the transaction. Penalties for subsequent convictions are more severe. Federally-defined schedules of controlled substances are published at 21 U.S.C. § 812.

In the case of a controlled substance in schedule I or schedule II, GHB (or, "liquid ecstasy"), or flunitrazepam (or, "rohypnol"), a person shall be sentenced to a term of

imprisonment of not more than 20 years. If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million.

In the case of a controlled substance in schedule III, a person shall be sentenced to a term of imprisonment of not more than 10 years, and if death or serious bodily injury results, shall be sentenced to a term of imprisonment of not more than 15 years or a fine not to exceed \$500,000, or both, for a first offense.

For less than 50 kilograms of marijuana, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

In the case of a schedule IV substance, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

Persons convicted on federal charges of drug trafficking within 1,000 feet of an elementary school, secondary school, college, or university (**21 U.S.C. § 860**) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year, unless the offense involves five grams or less of marijuana.

Federal Drug Possession Penalties (21 U.S.C. § 844) Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison, a mandatory fine of no less than \$1,000, or both. Second convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

For the most recent and complete Federal Trafficking Penalties information, visit the website of the U.S. Drug Enforcement Administration at <https://www.campusdrugprevention.gov/content/drug-scheduling-and-penalties>.

Drug and Alcohol State Laws

Category	Summary (Iowa Code)
Possession of Marijuana	Marijuana is a Schedule I controlled substance. Iowa Code § 124.204(4)(m). Iowa exempts hemp from Schedule I which has a maximum delta-9 tetrahydrocannabinol concentration of three-tenths of one percent or less on a dry weight basis as well as any hemp product with a maximum tetrahydrocannabinol concentration of three-tenths of one percent or less on a dry weight basis. §§ 124.204(7)(a), 204A.2. Limited usage of medical marijuana is permitted for patients with certain specified “debilitating medical conditions” in accordance with Iowa’s Medical Cannabidiol Act. §§ 124E.2, 124E.4, 124E.12, 124E.16. Generally, a medical cannabidiol dispensary will not dispense more than a combined total of 4.5 grams of total tetrahydrocannabinol to a patient and the

Category	Summary (Iowa Code)
	patient's primary caregiver in a ninety-day period. § 124E.9(14). However, there are exceptions to the 4.5-gram limit when 4.5 grams is insufficient or when the patient is terminally ill. § 124E.9(15). Recreational possession or use of marijuana is prohibited. § 124.401(5). A first-time violation of the prohibition on recreational possession or use is punishable by imprisonment for not more than 6 months (with a 48-hour mandatory minimum), a fine of not more than \$1,000, or both. <i>Id.</i> A second violation is punishable by a fine of \$430 to \$2,560 and imprisonment for up to one year (with a 48-hour mandatory minimum). §§ 124.401(5)(b), 903.1(1)(b). It is also illegal to manufacture, deliver, or possess with intent to manufacture or deliver marijuana. § 124.401(1). A violation of this provision with 50 kilograms or less of marijuana is a Class D felony, punishable by a fine of \$1,025 to \$10,245 and imprisonment for up to five years. §§ 124.401(1)(d), 902.9.
Controlled Substances	Iowa has a range of statutes governing controlled substances and their possession and distribution. §§ 124.101–124.418. It is unlawful to knowingly or intentionally possess a controlled substance without a prescription. § 124.401(5)(a). Doing so is a serious misdemeanor for a first offense. <i>Id.</i> A serious misdemeanor is punishable by a fine of \$430 to \$2,560 and possible imprisonment not to exceed one year (with a 48-hour mandatory minimum in this case). § 903.1. A second offense is an aggravated misdemeanor. § 124.401(5)(a). An aggravated misdemeanor is punishable by a fine of \$850 to \$8,540 and possible imprisonment for up to two years (with a 48-hour mandatory minimum in this case). § 903.1. Possession of a controlled substance near schools or certain other public properties may also result in an additional penalty of one hundred hours of community service. § 124.401B. It is unlawful to manufacture, deliver, or possess with the intent to manufacture or deliver a controlled substance, and the penalties depend on the type and amount of the substance involved. § 124.401(1). For instance, a violation with respect to over 500 grams of cocaine is punishable by imprisonment for up to 50 years and a fine of up to \$1 million. § 124.401(1)(a)(2)(b). Additionally, a violation with respect to more than five but less than 100 grams of heroin results in up to 25 years imprisonment and a fine of between \$5,000 and \$100,000. §§ 124.401(1)(b)(1), 902.9. A violation with respect to five grams or less of methamphetamine, 100 grams or less of cocaine, or five grams or less of heroin is punishable by up to 10 years imprisonment and a fine of \$1,000 to \$50,000. § 124.401(1)(c). Certain aggravating circumstances can lead to longer terms of imprisonment. § 124.401(1). It is unlawful for any person to knowingly or intentionally manufacture, deliver, sell, or possess drug paraphernalia. §

Category	Summary (Iowa Code)
	124.414(2). A violation constitutes a simple misdemeanor, which is punishable by a fine of \$105 to \$855, imprisonment for up to 30 days, or both. §§ 124.414(3), 903.1. It is also illegal for any person to sponsor, promote, or aid, or assist in the sponsoring or promoting of a meeting, gathering, or assemblage with the knowledge or intent that a controlled substance will be distributed, used, or possessed there. If the substance is marijuana, this is a serious misdemeanor, and if it is any other substance, this is a Class D felony. § 124.407.
Alcohol and Minors	Generally, it is unlawful for a person under the age of 21 to purchase, attempt to purchase, possess, or consume alcoholic beverages. § 123.47(3). A violation for a person 18 to 20 years of age results in a simple misdemeanor punishable in this case by a scheduled fine of \$260. §§ 123.47(4)(a)(1), 805.8C(7). A second offense is punishable by a fine of \$500 and either a substance abuse evaluation or a suspension of driving privileges for up to one year. § 123.47(4)(a)(2). A person who is of legal age, other than a licensee or permittee, who sells, gives, or otherwise supplies any alcoholic beverage to a person who is under legal age commits a serious misdemeanor punishable by a fine of \$500 to \$2,560 and potential imprisonment for up to one year. §§ 123.47(5), 903.1. A person under legal age shall not misrepresent the person's age for the purpose of purchasing or attempting to purchase any alcoholic beverage from any retail alcohol licensee. § 123.49(3). A violation constitutes a simple misdemeanor. § 123.50(1). Similarly, a person who is under the age of twenty-one and uses a fictitious or fraudulently altered driver's license or nonoperator's identification card to purchase, attempt to purchase, possess, or consume alcohol will be punished by a scheduled fine of \$260. §§ 321.216B, 123.47(3), 805.8A(4). Additionally, it is a simple misdemeanor to be intoxicated in a public place or to consume alcoholic liquor, wine, or beer upon public streets or highways. § 123.46(2).
Driving Under the Influence (DUI)	A person is guilty of an Operating While Intoxicated (OWI) if they operate a vehicle: while under the influence of an alcoholic beverage or other drug; while having a blood alcohol concentration of 0.08 percent or more; or while any amount of controlled substance is present in the person. § 321J.2(1). A first offense results in imprisonment for 48 hours to one year, a fine of \$1,250 (or all of the fine can be substituted by the court for unpaid community service), driver's license revocation for 180 days to one year, and assignment to substance abuse evaluation/treatment/prevention programs. § 321J.2(3). A second offense is punishable by imprisonment for not fewer than seven days and not more than two years, a fine of not less than \$1,875 and not more than \$6,250, driver's license revocation for one year, and assignment to substance abuse evaluation/treatment/prevention programs. § 321J.2(4).

Category	Summary (Iowa Code)
	In general, a driver or passenger of a motor vehicle upon a public street or highway shall not possess in the passenger area of the motor vehicle an open or unsealed bottle, can, jar, or other receptacle containing an alcoholic beverage or a beverage containing tetrahydrocannabinol. §§ 321.284, 321.284A. Violations of this provision are punishable by a scheduled fine of \$260. §§ 321.284, 321.284A, 805.8A(14)(e).

Drug and Alcohol Abuse Prevention Program

In compliance with the Drug Free Schools and Communities Act, the College has a drug and alcohol abuse and prevention program. For more information see below:

- Students are required to complete annual alcohol and drug abuse Cornerstone modules. An email is sent to students notifying them modules have been assigned and providing a link for access to the Cornerstone platform. These modules give a brief overview of alcohol and drug facts, relative federal, state and local laws and sanctions and local treatment resources.
- Drug and Alcohol Abuse Prevention policy for faculty, staff and students can be found here: [2-D-800-01 Drug and Alcohol Abuse Prevention.pdf](#).
- The College performs a biennial review of its DAAPP to assess its effectiveness and determine if sanctions are being consistently enforced. The most recent biennial review can be found here: [biennial review.pdf](#). For more information about biennial review please contact the Dean of Enrollment Management at (319) 226-2004.

Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Consistent with applicable laws, the College prohibits dating violence, domestic violence, sexual assault, and stalking. The College's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Sexual Harassment Policy:
<https://www.allencollege.edu/filesimages/PagePDFs/Policies/Health%20and%20Safety%20Policies/2-S-800-06%20Sexual%20Harassment%20Policy%20-%20Title%20IX.pdf>
- Student Disciplinary Action Policy:
<https://www.allencollege.edu/filesimages/PagePDFs/Policies/Academic%20Policies/2-D-100-01%20Student%20Disciplinary%20Action.pdf>

The following sections of this report discuss the College's educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees

should follow and the services available in the event they do become a victim of one of these offenses, and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

Primary Prevention and Awareness Program:

The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

Crime Type (Iowa Code)	Definitions
Dating Violence	The institution has determined, based on good-faith research, that Iowa law does not define the term dating violence.
Domestic Violence	The institution has determined, based on good-faith research, that Iowa law does not define the term domestic violence. However, Iowa law defines the following: • “Domestic Abuse” (Iowa Code § 236.2(2)): “Domestic abuse” means committing assault as defined in 708.1 under any of the following circumstances: a. The assault is between family or household members who resided together at the time of the assault. (“Family or household members” means spouses, persons cohabiting, parents, or other persons related by consanguinity or affinity.) b. The assault is between separated spouses or persons divorced from each other and not residing together at the time of the assault. c. The assault is between persons who are parents of the same minor child, regardless of whether they have been married or have lived together at any time. d. The assault is between persons who have been family or household members residing together within the past year and are not residing together at the time of the assault. e. (1) The assault is between persons who are in an intimate relationship or have been in an intimate relationship and have had contact within the past year of the assault. In determining whether persons are or have been in an intimate relationship, the court may consider the following nonexclusive list of factors: (a) The duration of the relationship; (b) The frequency of

Crime Type (Iowa Code)	Definitions
	interaction; (c) Whether the relationship has been terminated; (d) The nature of the relationship, characterized by either party's expectation of sexual or romantic involvement. (2) A person may be involved in an intimate relationship with more than one person at a time. ("Intimate relationship" means a significant romantic involvement that need not include sexual involvement. An intimate relationship does not include casual social relationships or associations in a business or professional capacity.) Assault (Iowa Code § 708.1(2)): A person commits an assault when, without justification, the person does any of the following: (a) Any act which is intended to cause pain or injury to, or which is intended to result in physical contact which will be insulting or offensive to another, coupled with the apparent ability to execute the act; (b) Any act which is intended to place another in fear of immediate physical contact which will be painful, injurious, insulting, or offensive, coupled with the apparent ability to execute the act; (c) Intentionally points any firearm toward another, or displays in a threatening manner any dangerous weapon toward another; (d)(1)(a) Intentionally points a laser emitting a visible light beam toward another person with the intent to cause pain or injury to another or toward an aircraft.
Stalking (Iowa Code § 708.11(2))	A person commits stalking when all of the following occur: - The person purposefully engages in a course of conduct directed at a specific person that would cause a reasonable person to feel terrorized, frightened, intimidated, or threatened or to fear that the person intends to cause bodily injury to, or the death of, that specific person or a member of the specific person's immediate family. - The person has knowledge or should have knowledge that a reasonable person would feel terrorized, frightened, intimidated, or threatened or fear that the person intends to cause bodily injury to, or the death of, that specific person or a member of the specific person's immediate family by the course of conduct. For the purposes of this section: "Course of conduct" means repeatedly maintaining a visual or physical proximity to a person without legitimate purpose, repeatedly utilizing a technological device to locate, listen to, or watch a person without authorization or legitimate purpose, or repeatedly conveying oral or written threats,

Crime Type (Iowa Code)	Definitions
	threats implied by conduct, or a combination thereof, direct at or toward a person. • “Immediate family member” means a spouse, parent, child, sibling, or any other person who regularly resides in the household of a specific person, or who within the prior six months regularly resided in the household of a specific person. • “Repeatedly” means on two or more occasions. • “Technological device” means any computer, cellular phone, smartphone, digital camera, video camera, audio recording device, global positioning device, or other electronic device that can be used for creating, storing, or transmitting information in the form of electronic data.
Sexual Assault	Sexual Assault (Iowa Code § 915.40): “Sexual assault” means sexual abuse as defined in section 709.1, or any other sexual offense by which a victim has allegedly had sufficient contact with a convicted or an alleged offender to be deemed a significant exposure. (Sexual abuse under section 709.1 is defined further below).
Rape, Fondling, Incest, Statutory Rape	For purposes of the Clery Act, the term “sexual assault” includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Iowa law are as follows: • Rape: The institution has determined, based on good-faith research, that Iowa law does not define the term rape. • Fondling: The institution has determined, based on good-faith research, that Iowa law does not define the term fondling. • Incest (Iowa Code § 726.2): A person, except a child as defined in section 702.5, who performs a sex act with another whom the person knows to be related to the person, either legitimately or illegitimately, as an ancestor, descendant, brother or sister of the whole or half blood, aunt, uncle, niece, or nephew, commits incest. • Statutory Rape: The institution has determined, based on good-faith research, that Iowa law does not define the term statutory rape.
Other “sexual assault” crimes	Other crimes under Iowa law that may be classified as a “sexual assault” include the following: • Sexual Abuse (Iowa Code § 709.1): Any sex act between persons is sexual abuse by either of the persons when the act is performed with the other person in any of the following circumstances: (1) The act is done by force or against the will of the other. If the consent or acquiescence of the other

Crime Type (Iowa Code)	Definitions
	is procured by threats of violence toward any person or if the act is done while the other is under the influence of a drug inducing sleep or is otherwise in a state of unconsciousness, the act is done against the will of the other; (2) Such other person is suffering from a mental defect or incapacity which precludes giving consent, or lacks the mental capacity to know the right and wrong of conduct in sexual matters; or (3) Such other person is a child. ○ Iowa Code § 702.17: The term “sex act” or “sexual activity” means any sexual contact between two or more persons by any of the following: (1) Penetration of the penis into the vagina or anus; (2) Contact between the mouth and genitalia or mouth and anus or by contact between the genitalia of one person and the genitalia or anus of another person; (3) Contact between the finger, hand, or other body part of one person and the genitalia or anus of another person, except in the course of examination or treatment by [certain healthcare providers]; (4) Ejaculation onto the person of another; (5) By use of artificial sexual organs or substitutes therefor in contact with the genitalia or anus; (6) The touching of a person’s own genitals or anus with a finger, hand, or artificial sexual organ or other similar device at the direction of another person. • Sexual Abuse in the First Degree (Iowa Code § 709.2): A person commits sexual abuse in the first degree when in the course of committing sexual abuse the person causes another serious injury. • Sexual Abuse in the Second Degree (Iowa Code § 709.3): A person commits sexual abuse in the second degree when the person commits sexual abuse under any of the following circumstances: ○ During the commission of sexual abuse the person displays in a threatening manner a dangerous weapon, or uses or threatens to use force creating a substantial risk of death or serious injury to any person. ○ The other person is a child. ○ The person is aided or abetted by one or more persons and the sex act is committed by force or against the will of the other person against whom the sex act is committed. • Sexual Abuse in the Third Degree (Iowa Code § 709.4): A person commits sexual abuse in the third degree when the person performs a sex act under any of the following circumstances:

Crime Type (Iowa Code)	Definitions
	○ The act is done by force or against the will of the other person, whether or not the other person is the person's spouse or is cohabiting with the person. ○ The act is between persons who are not at the time cohabiting as husband and wife and if any of the following are true: (1) The other person is suffering from a mental defect or incapacity which precludes giving consent; (2) <i>[Deleted by Acts 2021 (89 G.A.) S.F. 253, § 4, eff. July 1, 2021.]</i>; (3) The other person is fourteen or fifteen years of age and any of the following are true: (a) the person is a member of the same household as the other person; (b) the person is related to the other person by blood or affinity to the fourth degree; (c) the person is in a position of authority over the other person and uses that authority to coerce the other person to submit; (d) the person is four or more years older than the other person. ○ The act is performed while the other person is under the influence of a controlled substance, which may include, but is not limited to flunitrazepam, and all of the following are true: (1) The controlled substance, which may include but is not limited to flunitrazepam, prevents the other person from consenting to the act; (2) The person performing the act knows or reasonably should have known that the other person was under the influence of the controlled substance, which may include but is not limited to flunitrazepam. ○ The act is performed while the other person is mentally incapacitated, physically incapacitated, or physically helpless. • Lascivious Acts with a Child (Iowa Code § 709.8.1): It is unlawful for any person sixteen years of age or older to perform any of the following acts with a child with or without the child's consent unless married to each other, for the purpose of arousing or satisfying the sexual desires of either of them: ○ Fondle or touch the pubes or genitals of a child. ○ Permit or cause a child to fondle or touch the person's genitals or pubes. ○ Cause the touching of the person's genitals to any part of the body of a child. ○ Solicit a child to engage in a sex act or solicit a person to arrange a sex act with a child. ○ Inflict pain or discomfort upon a child or permit a child to inflict pain or discomfort on the person. • Indecent Contact with a Child (Iowa Code § 709.12): A person eighteen years of age or older is upon conviction guilty of an aggravated misdemeanor if the person commits

Crime Type (Iowa Code)	Definitions
	any of the following acts with a child, not the person's spouse, with or without the child's consent, for the purpose of arousing or satisfying the sexual desires of either of them: (a) Fondle or touch the inner thigh, groin, buttock, anus, or breast of the child; (b) Touch the clothing covering the immediate area of the inner thigh, groin, buttock, anus, or breast of the child; (c) Solicit or permit a child to fondle or touch the inner thigh, groin, buttock, anus, or breast of the person; (d) Solicit a child to engage in any act prohibited under section 709.8, subsection 1, paragraph "a", "b", or "e". • Lascivious Conduct with a Minor (Iowa Code § 709.14): 1. a. It is unlawful for a person over eighteen years of age or older who is in a position of authority over a minor to force, persuade, or coerce that minor, with or without consent, to disrobe or partially disrobe for the purpose of arousing or satisfying the sexual desires of either of them. b. A violation of this subsection is a serious misdemeanor. 2. For purposes of subsections 3 and 4, "minor" means a person fourteen or fifteen years of age. 3. a. It is unlawful for a person eighteen years of age or older who is in a position of authority over a minor to perform any of the following acts with that minor, with or without consent, for the purpose of arousing or satisfying the sexual desires of either of them: (1) Fondle or touch the inner thigh, groin, buttock, anus, or breast of the minor. (2) Touch the clothing covering the immediate area of the inner thigh, groin, buttock, anus, or breast of the minor. (3) Solicit or permit the minor to fondle or touch the inner thigh, groin, buttock, anus, or breast of the person. (4) Solicit the minor to engage in any act prohibited under subsection 4, paragraph "a", subparagraph (1), (2), or (3). b. A violation of this subsection is a serious misdemeanor. 4. a. It is unlawful for a person eighteen years of age or older who is in a position of authority over a minor to perform any of the following acts with that minor, with or without consent, for the purpose of arousing or satisfying the sexual desires of either of them: (1) Fondle or touch the pubes or genitals of the minor. (2) Permit or cause the minor to fondle or touch the person's genitals or pubes. (3) Cause the touching of the person's genitals to any part of the body of the minor. (4) Solicit the minor to engage in a sex act or solicit a person to arrange a sex act with the minor. (5) Inflict pain or discomfort upon the minor or permit the minor to inflict pain or discomfort on the person. b. A violation of this subsection is an aggravated misdemeanor.
Consent (as it relates to sexual activity)	The institution has determined, based on good-faith research, that Iowa law does not define the term consent (as it relates to sexual activity).

College Definition of Consent

The College uses the following definition of consent in its Sexual Harassment Policy for the purpose of determining whether sexual violence, including sexual assault, has occurred.

Consent

“Consent” refers to words or actions that a reasonable person in the perspective of the Respondent would understand as agreement to engage in the sexual conduct at issue. A person who is incapacitated is not capable of giving Consent.

Lack of consent is a critical factor in determining whether Sexual Harassment has occurred. As defined above, consent is an informed, freely given, and mutually understood agreement to participate in specific sexual acts with another person that is not achieved through unreasonable manipulation or coercion—or any kind of physical force or weapon—and requires having cognitive ability to agree to participate. Consent requires an outward demonstration, through mutually understandable words, conduct or action, indicating that an individual has freely chosen to engage in specific sexual acts. A verbal “no” constitutes lack of consent, even if it sounds insincere or indecisive.

- Silence or lack of physical or verbal resistance does not imply consent.
- If coercion, intimidation, threats, and/or physical force are used, there is no consent.
- Consent cannot be inferred from a person’s manner of dress.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity.
- Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.
- Consent to past sexual activity does not constitute consent to future sexual activity.
- Consent can be withdrawn at any time. A person who initially consents to sexual activity is deemed not to have consented to any sexual activity that occurs after he or she withdraws consent. When consent is withdrawn, sexual activity must immediately stop.
- Being in a romantic relationship with someone does not imply consent to sexual activity. Even in the context of an ongoing relationship, consent must be sought and freely given for each specific sexual act.
- Effective consent may not exist when there is a disparity in power between the parties (e.g., faculty/student, supervisor/employee).
- A person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following:
 - The individual is incapacitated due to drug or alcohol consumption, either voluntarily or involuntarily,
 - The individual is unconscious, asleep, or otherwise unaware that sexual activity is occurring,

- The individual is below the minimum age of consent in the applicable jurisdiction (16 years in Iowa or,
- The individual has a mental disability that impairs his or her ability to provide consent.

Incapacitated

“Incapacitated” refers to the state where a person does not appreciate the nature or fact of sexual activity due to the effect of drugs or alcohol consumption, medical condition or disability, or due to a state of unconsciousness or sleep.

Incapacitation is a state where an individual cannot make an informed and rational decision to consent to engage in sexual contact because the individual lacks conscious knowledge of the nature of the act (e.g., to understand the “who, what, where, when, why or how” of the sexual interaction) and/or is physically or mentally helpless. An individual is also considered incapacitated, and therefore unable to give consent, when asleep, unconscious, or otherwise unaware that sexual contact is occurring.

Incapacitation can only be found when the Respondent knew or should have known that the Complainant was incapacitated when viewed from the position of a sober, reasonable person. One’s own intoxication is not an excuse for failure to recognize another person’s incapacitation.

Incapacitation may result from the use of alcohol and/or other drugs; however, consumption of alcohol or other drugs, inebriation, or intoxication alone are insufficient to establish incapacitation. Incapacitation is beyond mere drunkenness or intoxication. The impact of alcohol or drugs varies from person to person, and evaluating incapacitation requires an assessment of how consumption of alcohol and/or drugs impacts an individual’s:

- Decision-making ability,
- Awareness of consequences,
- Ability to make informed judgments,
- Capacity to appreciate the nature of circumstances of the act.

No single factor is determinative of incapacitation. Some common signs that someone may be incapacitated include slurred speech, confusion, shaky balance, stumbling or falling down, vomiting, and unconsciousness.

Coercion

“Coercion” is direct or implied threat of force, violence, danger, hardship, or retribution sufficient to persuade a reasonable person of ordinary susceptibility to perform an act which otherwise would not have been performed or acquiesce in an act to which one would otherwise not have submitted. Coercion can include unreasonable and sustained pressure for sexual activity. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. A person’s words or conduct cannot amount to Coercion for purposes

of this Policy unless they wrongfully impair the other's freedom of will and ability to choose whether or not to engage in sexual activity.

Risk Reduction

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor "NO" clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible for your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating "rape drug" like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don't make assumptions about the other person's consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you their intentions.
- Consider "mixed messages" a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don't take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don't be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include past abuse; threats of violence or abuse; breaking objects; using force during an argument; jealousy; controlling behavior; quick involvement; unrealistic expectations; isolation; blames others for problems; hypersensitivity; cruelty to animals or children; "playful" use of force during sex; Jekyll-and-Hyde personality.

Bystander Intervention

In addition to reporting incidents to appropriate authorities, below are some ways in which individuals can take safe and positive steps to prevent harm and intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking against another person.

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or an antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- If things get out of hand, don't hesitate to contact the police.

Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

Ongoing Prevention and Awareness Campaign:

The College also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

PPAP and OPAC Programming Methods:

The PPAP and OPAC are carried out in a variety of ways, using a range of strategies, and, as appropriate, targeting specific audiences throughout the College. Methods include, but are not limited to, online presentations, distribution of written materials, periodic email blasts, and guest speakers. Past programming and currently planned programming include the following:

Date	Event	Audience
Various (Upon Hire)	Title IX Training – Cornerstone Module FERPA Training – Cornerstone Module	Allen College Faculty, Staff & Adjunct
Spring 2026	Title IX Training – Cornerstone Module FERPA Training – Cornerstone Module	All New and Returning Allen College Students
Summer 2026	Title IX Training – Cornerstone Module FERPA Training – Cornerstone Module	All New and Returning Allen College Students
Fall 2026	Title IX Training – Cornerstone Module FERPA Training – Cornerstone Module	All New and Returning Allen College Students
Fall 2026	Title IX Training – Cornerstone Module FERPA Training – Cornerstone Module	All Allen College Faculty, Staff & Adjunct

The Student Primary Prevention and Awareness Program (PPAP) is required annually for new students. Because the College recognizes that the prevention of sexual misconduct, including domestic violence, dating violence, sexual assault, and stalking, is important, it offers educational programming to a variety of groups such as campus personnel, incoming students, and new employees. Among other elements, such training covers relevant definitions, procedures, and sanctions; provides safe and positive options for bystander intervention; and provides risk reduction information, including recognizing warning signs of abusive behavior and how to avoid potential attacks. Although the student PPAP is aimed at new students, it is required of all students annually and is provided through online delivery.

The Employee Primary Prevention and Awareness Program (PPAP) is required annually for all new and returning employees. Among other elements, such training will cover relevant definitions, procedures, and sanctions; will provide safe and positive options for bystander intervention; and will provide risk reduction

information, including recognizing warning signs of abusive behavior and how to avoid potential attacks. Although this Primary Prevention and Awareness Program (PPAC) is aimed at new employees, it is required of all employees annually. The training is provided through multiple delivery methods including face-to-face and online to accommodate learning styles and schedules.

As part of its ongoing campaign, the College uses a variety of strategies, such as emails blasts with pertinent information, Facebook campaign, etc. While programming occurs throughout the year, the College also offers educational sessions in coordination with nationally recognized observances such as Sexual Assault Awareness Month and Domestic Violence Awareness Month.

Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:

If you believe you are the victim of sexual assault, domestic violence, dating violence, or stalking, get to safety and call 911 and/or campus security at (319) 240-7189. You may also contact the Title IX Coordinator at (319) 226-2004. The College also encourages all individuals who feel they have been victims of sexual assault, domestic violence, dating violence, or stalking to seek immediate assistance from a medical provider for emergency services, including treatment of any injury.

Seeking medical attention and preserving evidence helps preserve the full range of options for an individual, including the options of working through the College's Complaint Resolution Procedures and/or legal options including obtaining a protective order from a court, pursuing a civil action, and/or participating in a law enforcement investigation and criminal prosecution.

Even if an individual has not been physically hurt, a timely medical examination is recommended so that forensic evidence can be collected and preserved. An individual may choose to allow the collection of evidence by medical personnel even if they choose not to make a report to the police.

Local medical assistance can be obtained at:

UnityPoint Health – Allen Hospital (319) 235-3697 Emergency Department

MercyOne (319) 272-7050 Emergency Department

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the

- victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at UnityPoint Health – Allen Hospital, 1825 Logan Avenue, Waterloo, IA (319) 235-3941.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

Security/Law Enforcement & How to Make a Police Report

- UnityPoint Health – Waterloo Security (319) 240-7189
- Waterloo Police Department, 715 Mulberry St, Waterloo, IA (319) 291-4340
- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim's ability.

Information about Legal Protection Orders

Individuals who feel they have experienced sexual assault, domestic violence, dating violence, or stalking have the option to pursue a criminal complaint with the appropriate law enforcement agency, to pursue a complaint with the College through its Complaint Resolution Procedures or to pursue both processes consecutively or concurrently. A victim of Sexual Assault, Domestic Violence, Dating Violence, or Stalking also has the right not to pursue any complaint to either the College or to a law enforcement agency.

For more information regarding the option to pursue a criminal complaint, contact:

UnityPoint Health – Waterloo Security (319) 240-7189 or non-emergency number (319) 235-3869 or (319) 235-1392.

Waterloo Police Department, 911 or non-emergency number (319) 291-4340.

The Title IX Coordinator and the Campus Security Department are available to assist students with contacting appropriate law enforcement authorities. (For more information on the extent of a particular law enforcement agency's reporting obligations to other entities or its ability to protect an individual's privacy or have confidential communications during the criminal complaint process, contact the appropriate law enforcement agency.)

Allen College complies with Iowa law in recognizing orders of protection. There are three main civil types (Domestic Abuse, Sexual Abuse and Stalking) of protective orders that differ based on the nature of the threat and the victim's relationship to the abuser. Protective orders can be filed in the county where the victim or the abuser lives. Forms, guides, and victim resources are available at [Court Forms | Iowa Judicial Branch](#). Iowa Legal Aid offers free domestic abuse booklets and assistance can be found at [Iowa Legal Aid](#).

The main types of protective orders are:

- Domestic Abuse Protective Orders: Victims of abuse by a family or household members.
- Sexual Abuse Protective Orders: Victims of sexual assault, even if they do not know the offender.
- Stalking Protective Orders: Individuals experiencing repeated harassment, following, or threats.
- No-Contact Orders (Criminal Cases): Issued automatically by a judge in many criminal cases involving domestic abuse, assault, and harassment.
- Civil Harassment/Restraining Orders: Iowa mainly uses this category but some situations involving harassment may fall under stalking or sexual abuse protective orders, depending on behavior.

In addition to having the option of pursuing a criminal complaint, individuals also have the right to request that law enforcement issue emergency protective restraining orders or to pursue such orders through the court process. The College can assist parties who wish to do so. Individuals who receive emergency or permanent protective or restraining orders through a criminal or civil process should notify the Title IX Coordinator so that the College can work with the individual and the subject of the restraining order to manage compliance with the order on campus. For more information about such orders see:

Black Hawk County Courthouse, 316 East 5th Street, Waterloo, IA 50703 (319) 833-3000.

The Iowa Judicial Branch can provide the necessary forms and may assist in completing the forms. Forms may also be found at [Court Forms | Iowa Judicial Branch](#).

When a protection order is granted, it is enforceable statewide. If you have obtained a protection order and need it to be enforced in your area, you should contact the local police department.

The College will also enforce any temporary restraining order or other no contact order against the alleged perpetrator from a criminal, civil, or tribal court. Any student or employee who has a protection order or no contact order should notify the Title IX Coordinator and provide a copy of the restraining order so that it may be kept on file with the institution and can be enforced on campus, if necessary. Upon learning of any orders, the institution will take all reasonable and legal action to implement the order.

The College does not issue legal orders of protection. However, as a matter of institutional policy, the institution may impose a no-contact order between individuals in appropriate circumstances. This institution may also issue a “no trespass warning” if information available leads to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

Available Victim Services:

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the College and in the surrounding community. Those services include:

- Student Financial Aid – Sometimes a victim of a crime may feel the need to take a leave of absence from school. If a student is considering a leave of absence based on the circumstances of a complaint, he/she should understand there may be financial aid implications in taking such leave. This should be discussed with financial aid personnel, and the Title IX Coordinator for your campus can assist in facilitating this conversation if desired. The College’s financial aid website can be found at: [Financial aid process, application & information | Allen College](#)
- Iowa Legal Aid: <https://www.iowalegalaid.org/>
- National Domestic Violence Hotline: (800) 799-7233
- National Sexual Assault Hotline: (800) 656-4673
- Rape, Abuse and Incest National Network (RAINN): <https://www.rainn.org/>
- US Dept. of Justice Office on Violence Against Women: <https://www.justice.gov/ovw>
- National Coalition Against Domestic Violence: <https://www.thehotline.org/>
- National Sexual Violence Resource Center: <http://www.nsvrc.org/>
- U.S. Citizenship and Immigration Services: <https://www.uscis.gov/>
- Immigration Advocates Network: <https://www.immigrationadvocates.org/>

The following services list is meant to be a guide, is not all-inclusive and is subject to change:

Judicial Services	
UnityPoint Health – Waterloo Security ER Entrance 1825 Logan Avenue Waterloo, IA 50703	Security personnel are responsible for providing protection, surveillance and access control for the organization. Provide investigations

(319) 235-3869 (319) 240-7189 (cell)	into potential criminal activity that occurred on campus. Sexual abuse and other criminal activity can be reported.
Waterloo Police Department 715 Mulberry Street Waterloo, IA 50703 (319) 291-2515 or 911 (emergency)	To report sexual abuse that occurred in Waterloo. Reporting is not the same as filing charges but would initiate an investigation of the assault.
Cedar Falls Police Department 4600 Main Street Cedar Falls, IA 50613 (319) 273-8612 or 911 (emergency)	To report sexual abuse that occurred in Cedar Falls. Reporting is not the same as filing charges but would initiate an investigation of the assault.
Waverly Police Department 111 4 th Street NE Waverly, IA 50677 (319) 352-5400 or 911 (emergency)	To report sexual abuse that occurred in Waverly. Reporting is not the same as filing charges but would initiate an investigation of the assault.
Black Hawk County Sheriff's Department 225 E 6 th Street Waterloo, IA 50703 (319) 291-2587	To report sexual abuse that occurred in Black Hawk County Sheriff's Department. Reporting is not the same as filing charges but would initiate an investigation of the assault.
Bremer County Sheriff's Department 111 4 th Street NE Waverly, IA 50677 (319) 352-5400	To report sexual abuse that occurred in Bremer County Sheriff's Department. Reporting is not the same as filing charges but would initiate an investigation of the assault.
Black Hawk County Attorney's Office Black Hawk County Courthouse Room B-1 316 E. 5th Street Waterloo, IA 50703 (319) 833-3001	Review cases and make a determination of prosecution of sexual abuse/assault cases that occurred within their jurisdiction.
Allen College Administration Office, Academic Affairs Office, or Enrollment Management Office (319) 226-2000 (General Information)	To file a College complaint if the perpetrator is a student. A victim/survivor can simultaneously pursue criminal prosecution and College disciplinary sanctions against the perpetrator(s).
Psychological Services	
UnityPoint Health – Waterloo Allen Counseling Center (319) 235-3550 Toll Free (800) 303-9996 www.unitypoint.org/locations/allen-hospital-counseling-center-and-eap	Counseling and referral services are available to Allen College students and employees.

UnityPoint Health – Waterloo Allen Mental Health Walk-In Clinic (319) 226-2106 UnityPoint Health – Mental Health Walk-In Clinic	Provide counseling and link with community resources.
Cedar Valley Friends of the Family 24 Hour Crisis Line (319) 352-0037 or (800) 410-7233 https://www.fofia.org	Offers services dealing with domestic violence and sexual assault. Telephone support offered for any type of problem, also offered through collect calls. Victims' name not necessary. Advocacy services are in conjunction with a medical exam and/or legal proceedings.
Iowa Coalition Against Domestic Violence Iowa Domestic Violence Hotline: (800) 770-1650 or TEXT: IOWAHELP to 20121 https://www.icadv.org	24-hour crisis line, 24-hour rape/sexual assault medical, legal and court advocacy, individual counseling, support groups, emergency cellular phone loan program, transportation to medical and counseling appointments as needed, training, community education and prevention services.
Black Hawk-Grundy Mental Health Center Inc. 3251 W 9th Street Waterloo, IA 50702 (319) 234-2893 or (800) 583-1526 Black Hawk-Grundy Mental Health Center (unitypoint.org)	Individual and family counseling services. Eligibility for counseling services is based upon county eligibility guidelines, managed care and/or insurance requirements. Services are provided on a sliding fee scale based upon income.
Waypoint Services Crisis line (800) 208-0388 Business (319) 365-1458 www.waypointservices.org	Waypoint provides shelter and support for women and families in crisis due to homelessness, poverty, and domestic violence. It also provides quality, affordable child-care.
Medical Services	
UnityPoint Health – Allen Hospital 1825 Logan Avenue Waterloo, IA 50703 (319) 235-3941 www.unitypoint.org	24-Hour emergency medical services and examinations for evidence using a rape kit. Located adjacent to Allen College campus.
MercyOne Cedar Falls Medical Center 515 College Street Cedar Falls, IA 50613 (319) 268-3000 https://www.mercyone.org/location/mercyone-cedar-falls-medical-center	24-Hour emergency medical services and examinations for evidence using a rape kit. Close to UNI campus.

UnityPoint Health – Allen Hospital, Allen Women's Health Center 233 Vold Drive Waterloo, IA 50703 (319) 235-5090 Allen Women's Health (unitypoint.org)	Provides reproductive health care for the women of Northeast Iowa. The Center receives Title V Maternal Health, Title X Family Planning from the Iowa Department of Public Health for Black Hawk, Bremer, Buchanan, and Grundy County service areas. In addition, Adolescent Pregnancy Prevention funds are received from the Iowa Department of Human Services. The Women's Health Center is known area wide for providing health services for women of all income levels and ages.
Waverly Health Center 312 9th Street SW Waverly, IA 50677 (319) 352-4120 www.waverlyhealthcenter.org	24-Hour emergency medical services and examinations for evidence using a rape kit. Close to Wartburg campus.
Black Hawk County Sexually Transmitted Disease Clinic 1407 Independence Ave., Suite 5 Waterloo, IA 50703 (319) 291-2413	Free, confidential sexually transmitted disease testing and treatment, anonymous HIV antibody testing. No appointment necessary. Please phone for clinic hours.
Religious/Spiritual Services	
Allen Hospital Spiritual Care 1825 Logan Avenue Waterloo, IA 50703 (319) 235-3694	Spiritual counseling available.
Wartburg College Ministry Services 100 Wartburg Blvd. Waverly, IA 50677 (319) 352-8217	Spiritual counseling available.
UNI Campus Ministries are listed in the UNI telephone directory. (319) 273-2311 for assistance in locating a specific denomination	Spiritual counseling available.
Financial Services	
Crime Victim Compensation Program (800) 373-5044 or (515) 281-5044	Reimbursement for cost of sexual assault evidence collection ("rape kit" exam). Will reimburse for other crime-related expenses (e.g., lost wages, medical /counseling costs) under certain conditions.
Education/Advocacy Services	
Center for Violence Prevention 309 Sabin Hall	Counseling, medical & legal referrals, safe housing arrangements,

University of Northern Iowa Cedar Falls, IA 50614-0409 (319) 273-3545	assistance with academic concerns (e.g., coursework extensions, excused absences, reduced course loads), meeting accompaniment, initiation of No Contact and/or No Trespass orders. Coordination of campus-wide prevention efforts.
Black Hawk County Crime Victim Witness Assistance Program (319) 833-3001	Information regarding victim's rights and assistance in trial preparation, in obtaining restitution and in reclaiming property held as evidence. Referral assistance and accompaniment to court (if desired).
Iowa Statewide Sexual Abuse Hotline (800) 284-7821	The Iowa Sexual Abuse Hotline is a 24-hour line providing support, information and referral services to survivors of sexual abuse, significant others, and individuals seeking information and referrals. All services are confidential, free of charge and available to women, men and children. The Iowa Sexual Abuse Hotline assists callers in accessing local resources such as sexual assault and domestic violence centers, shelters, law enforcement agencies, hospitals, county attorney offices, and other counseling services.
Waterloo Riverview Center (888) 557-0310 (319) 939-9599 (Daytime) www.riverviewcenter.org	24-hour sexual assault crisis and support line
Waypoint Services Crisis line (800) 208-0388 Business (319) 365-1458 www.waypointservices.org	24-hour relationship violence crisis and support line

Accommodation and Protective Measures:

The College will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the College is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

The College will provide written notification to complainants regarding available options for, and assistance in changing academic, living, transportation, and working situations, as well as available protective measures. Interim measures may include separating the parties; placing limitations on contact between the parties, suspension; and adjustments to class, work, or housing arrangements.

Additional measures may include counseling, training, separation of the parties, and/or discipline of the respondent, including but not limited to: no-contact orders; classroom reassignment; the provision of counseling or other support services; written reprimands; a grade penalty of zero (0); restitution for damages; conditional status with requirements for continued enrollment; suspension or termination of specific privileges, suspension from the College for a specified period of time; demotion; termination of employment; dismissal; expulsion; referral for prosecution for violations of law; or other appropriate institutional sanctions.

If a complainant requests accommodation or protective measures, and those accommodations or measures are reasonably available, the College will provide them regardless of whether the complainant chooses to report the incident to campus security, local law enforcement, or both, or neither.

Requests for accommodation or protective measures should be made to the Title IX Coordinator at (319) 226-2004, and the Title IX Coordinator is responsible for deciding what, if any, accommodations or protective measures will be implemented.

When determining the reasonableness of such a request, the College may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.
- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The College will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the College's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the

accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, the College will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

Procedures for Disciplinary Action:

Allegations of domestic violence, dating violence, sexual assault or stalking will be processed through the institution's Sexual Harassment Policy and the related complaint resolution procedures. The procedures are utilized whenever or wherever a complaint is made, regardless of the status of the complainant and the respondent. Whether the allegations are founded or unfounded under Title IX, the Student Disciplinary Action Policy may be utilized.

The complaint resolution procedures are invoked once a report is made to one of the following individuals:

Title IX Coordinator

Dr. Joanna Ramsden-Meier
Dean of Enrollment Management
(319) 226-2004
Office #132 Barrett Forum
Joanna.Ramsden-Meier@allencollege.edu

Title IX Deputy Coordinator

Denise Hanson
Executive Director, Business & Finance
(319) 226-2012
Office #146 Barrett Forum
Denise.Hanson@allencollege.edu

Reports may be made by complainants, third parties, witnesses, or bystanders, and may be made in person, by regular mail, telephone, electronic mail, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report.

Preliminary Assessment

The Title IX Coordinator reviews a report of sexual harassment to determine if the reported conduct falls within the College's Sexual Harassment Policy and could constitute sexual harassment. If the conduct does not meet policy scope, the case is closed. The reporting party may be notified (consistent with FERPA), and the matter may be referred to other relevant College offices or policies. If the conduct could fall within the policy, the Coordinator will move forward and contact the complainant. During this assessment, the Coordinator may take steps to identify the complainant if their identity is not clear.

Contacting the Complainant

If the report proceeds and the complainant is known, the Title IX Coordinator will promptly contact them to discuss available supportive measures and consider the complainant's preferences, explain that supportive measures are available with or without filing a formal complaint, and provide guidance on how to file and pursue a formal complaint. The complainant is also given information about reporting to local law enforcement and campus and community resources for support.

Supportive Measures

The College will provide supportive measures to the complainant even if they choose not to file a formal complaint. The respondent is offered supportive measures, both when notified of a formal complaint, and earlier, if they request them. Both parties receive a written document outlining their rights, options, and resources, available supportive measures, and the College's investigation and resolution procedures. The College will keep supportive measures confidential as much as possible, unless doing so would prevent those measures from being provided.

Interim Removal

The Title IX Coordinator may temporarily remove a student respondent from programs or activities if a safety and risk analysis finds an immediate threat to health or safety. If removed, the respondent must be given an opportunity to challenge the decision within 24 hours. For employee respondents, the College may place them on administrative leave at any point, including during an investigation. For other individuals (e.g., contractors or guests), the College has broad authority to restrict campus access at any time, for any reason.

Formal Complaint

A complainant may file a Formal Complaint requesting investigation and adjudication, as long as they are participating (or attempting to participate) in a College program or activity. Complaints can be submitted in person, by mail, or by email, and must be filed by the complainant themselves. The Title IX Coordinator may file a Formal Complaint on the College's behalf (even if the complainant does not), typically in serious or ongoing risk situations, considering factors such as:

- Prior complaints or history of violence by the respondent.
- Threats or repeated misconduct.
- Use of a weapon or multiple perpetrators.
- Whether the complainant is a minor.
- Availability of independent evidence.
- Patterns of misconduct affecting the community.

Once a formal Complaint is filed, the College will begin an investigation and adjudication process, and the complainant is treated as a party regardless of participation level. If the Coordinator files the complaint, they do not act as a party in

the process. If no Formal Complaint is filed, the Title IX process does not proceed, though the report may be referred to other College offices.

Consolidation of Formal Complaints

The College may combine multiple Formal Complaints into one case when they involve the same facts or circumstances, including multiple respondents, multiple complainants, and cross-complaints between parties. References to singular terms like “party,” “complainant,” or “respondent” apply to multiple individuals when cases are consolidated. A retaliation complaint may also be combined with a sexual Harassment complaint.

Dismissal Prior to Commencement of Investigation

The Title IX Coordinator must dismiss a Formal Complaint if the alleged conduct would not qualify as sexual harassment, even if proven, or the conduct falls outside the policy's scope (e.g., did not occur within College programs/activities or outside the U.S.). When a complaint is dismissed, both parties receive written notice and information about their rights to appeal. The matter may be referred to other College offices for further review if appropriate. Such a dismissal is generally considered a final decision under the policy, unless stated otherwise in writing.

Notice of Formal Complaint

Within 5 days of receiving a Formal Complaint, the Title IX Coordinator sends both parties a written notice that includes:

- A copy or link to the Sexual Harassment Policy,
- Key details of the allegations (parties involved, conduct, date, and location, if known),
- A statement that the respondent is presumed not responsible until the process is complete,
- Information on the right to an advisor of choice,
- Information on the right to review evidence,
- Notice of rules prohibiting retaliation and false statements, and
- Information about campus and community resources.

If new allegations arise later, the College will issue a supplemental notice describing them.

Investigation

Commencement and Timing

After issuing the notice of Formal Complaint, a designated investigator conducts an evidence-gathering investigation, including both supporting and opposing evidence. The college, not the parties, has the responsibility to gather sufficient evidence. The investigation results in a written report, which is submitted to the adjudicator. The College aims to complete investigations within 30 - 45 days, though timing may vary based on circumstances.

Equal Opportunity

During the investigation, both parties have an equal opportunity to be interviewed, present witnesses (fact or expert), and submit relevant evidence (both supporting and opposing). The investigator may limit witnesses if their testimony is repetitive or unnecessary, they are only character references without relevant knowledge, and their testimony is inadmissible (e.g., certain sexual history evidence). Parties are not restricted from gathering and presenting relevant evidence on their own. The investigation is the primary opportunity to present evidence. If a party chooses not to present evidence or identify witnesses during this state, they generally cannot introduce it later during adjudication, unless there is a valid reason (e.g., mistake or excusable neglect).

Documentation of Investigation

The investigator will document the investigation using reasonable methods. Interviews may be recorded through notes, audio, video, or written transcripts. The investigator chooses the recording method at their discretion but must use the same method consistently throughout the investigation.

Access to Evidence

Before finalizing the investigation report, the investigator shares all relevant evidence with both parties and their advisors, including evidence for or against the allegations, even if not relied upon. Parties have 10 days to submit a written response, which the investigator will review before completing the report. Evidence may be reviewed only for the grievance process and cannot be copied or shared publicly by the parties or their advisors.

Investigation Report

After the 10-day response period, the investigator prepares a written investigation report that outlines the steps taken during the investigation, summarizes the relevant evidence and identifies facts both agreed upon and disputed by the parties. The completed report is shared with the Title IX Coordinator, both parties and their advisors, in electronic or hard copy form.

Adjudication Process Selection

After the investigation report is shared, the Title IX Coordinator notifies both parties of two adjudication options:

- The hearing process (the default), and
- Administrative adjudication (optional).

Administrative adjudication is only used if both parties agree in writing. The notice includes a consent form and encourages parties to review the policy and consult advisors or attorneys before deciding. Each party has 3 days to return the signed consent form if both consent, administrative adjudication is used or if either party declines or does not respond, the case proceeds with the hearing process.

Adjudication

Hearing Process

The hearing process is the standard method for resolving Formal Complaints. It will be used in all cases unless both parties agree in a timely manner to use administrative adjudication instead.

Hearing Officer

Once the hearing process is selected, the Title IX Coordinator will appoint a hearing officer to manage the hearing and issue a final determination of responsibility. The hearing officer receives the investigation report and all evidence previously shared with the parties.

Hearing Notice and Response to the Investigation Report

After appointment, the hearing officer notifies both parties of their appointment, deadlines for written responses to the investigation report, dates for the pre-hearing conference and hearing and a copy of the Hearing Procedures. The pre-hearing conference and hearing must be scheduled at least 10 days after the notice. Each party's written response must include any disagreements with the investigation report, arguments to exclude evidence (e.g., relevance, privilege, sexual history), lists of witnesses (requested or voluntary), objections to hearing procedures, requests for separation or accommodations and advisor information (or request for one). Responses may also include arguments about whether the evidence supports the allegations and whether the conduct qualifies as sexual harassment.

Pre-Hearing Conference

Before the hearing, the hearing officer holds a pre-hearing conference with both parties and their advisors.

It is conducted live with real-time participation, typically in person, but parties can be separated into different rooms upon request (with video/audio connection), and it may also be conducted virtually, at the hearing officer's discretion.

During the conference, the hearing officer will review hearing procedures, address issues raised in written responses, discuss possible stipulations to streamline the hearing, review witness lists (requested and voluntary) and resolve any pre-hearing issues deemed necessary.

Issuance of Notices of Attendance

After the pre-hearing conference, the hearing officer sends attendance notices to students or College Employees requested as witnesses, including the hearing date and time.

Recipients must notify the hearing officer of any serious scheduling conflicts.

Witnesses should inform supervisors (e.g., managers, faculty, coaches) of conflicts, and those supervisors are required to excuse or accommodate them so they can attend.

The college does not issue attendance notices to witnesses who are not students or employees.

Hearing

The hearing is conducted live and recorded (audio), with recordings available to parties for review and appeal preparation.

Participants (parties, advisors, witnesses, officials) typically attend in person, but parties may request separate rooms with video/audio, or the hearing may be held virtually.

Key hearing elements include:

- Parties can speak directly to the hearing officer.
- Advisors may question the other party and witnesses in real time.
- Parties can raise objections, which the hearing officer will rule on.
- Limited opportunity to submit new evidence (if previously unavailable).
- Each party may give a closing argument.

Additional rules:

- Hearings are closed to the public.
- Witnesses are sequestered until they testify.
- Parties cannot directly question each other (advisors do this).
- All participants have access to the evidence and report.

The hearing officer has broad discretion over procedures, evidence, and conduct, and may limit participation if someone is disruptive.

The hearing is not a formal court proceeding, and strict rules of evidence do not apply.

Subjection to Questioning

If a party or witness does not attend the hearing or refuses to answer questions from advisors, the hearing officer may still consider their prior statements (from the investigation or hearing) when making a determination.

Deliberation and Determination

After the hearing, the hearing officer reviews all relevant evidence, including both supporting and opposing information from the investigation and hearing.

Decisions must be objective and free from bias, and credibility cannot be based on someone's role (complainant, respondent, or witness).

The hearing officer excludes any inadmissible evidence previously ruled out.

Using the preponderance of the evidence standard ("more likely than not"), the hearing officer resolves disputed facts and determines whether the evidence shows a violation of the Sexual Harassment Policy.

Discipline and Remedies

If the hearing officer finds the respondent responsible, they will consult with a College official who has authority to decide the appropriate disciplinary action. They will also consult with the Title IX Coordinator to determine appropriate supportive measures or remedies for the complainant.

These consultations occur before the written decision is issued.

Written Decision

After making a determination and consulting on discipline and remedies, the hearing officer issues a written decision that includes:

- The allegations of sexual harassment,
- A summary of the process and investigation steps,
- Findings of fact based on the preponderance of evidence,
- A decision and explanation for each allegation,
- Any disciplinary action imposed,
- Any ongoing support measures or remedies for the complainant, and
- Information on the appeal process.

The decision is shared with both parties, which officially concludes the hearing process (unless appealed).

The College aims to issue the decision within 14 days after the hearing outcome.

Administrative Adjudication (Optional)

Instead of a hearing, cases may be resolved through administrative adjudication, but only if both parties voluntarily agree in writing, and the Title IX Coordinator approves.

Either party may withdraw at any time before a decision and request a hearing.

An administrative officer is appointed and provided with the investigation report and all evidence.

The process includes:

- Written notice to both parties with deadlines and meeting dates (at least 10 days after notice).
- Written responses from each party addressing disagreements, evidence issues, and arguments about the allegations.

- Separate meetings with each party to present additional input and answer questions.

The administrative officer reviews all relevant evidence objectively, excludes inadmissible evidence and applies the preponderance of evidence standard to determine responsibility.

The officer then consults on discipline and remedies and issues a written decision, which concludes the process (subject to appeal).

The College aims to complete this process within 21 days.

Limitation: Administrative adjudication is not allowed when a non-student employee is accused of harassing a student.

Dismissal During Investigation or Adjudication

The College must dismiss a Formal Complaint at any stage if:

- The alleged conduct would not qualify as sexual harassment, even if proven, or
- The conduct falls outside the policy's scope (not within programs/activities or outside the U.S.).

The College may dismiss a complaint if:

- The complainant requests withdrawal (in whole or in part).
- The respondent is no longer affiliated with the College.
- There is insufficient evidence to reach a determination.

When a complaint is dismissed:

- Both parties receive written notice and appeal rights.
- The matter may be referred to other College offices.

Appeal

Either party may appeal a decision or dismissal only on these grounds:

- Procedural error that affected the outcome.
- New evidence not previously available that could impact the outcome.
- Conflict of interest or bias by key officials.
- Disproportionate sanction.

Appeals must be filed within 7 days of the decision (or within 3 days of the other party's appeal, if applicable) and submitted in writing to the Provost (appeal officer), clearly stating grounds, reasoning, and requested outcome.

The appeal officer will review for validity and timeliness (dismiss if requirements aren't met), notify the other party, who has 7 days to respond and review relevant records and issue a written decision within 7 days after responses.

A decision becomes final when the appeal period passes with no appeal, or all appeals have been resolved.

No further review is allowed beyond this appeal process.

The College aims to resolve appeals within 21 days.

Informal Resolution

After a Formal Complaint is filed and before an appeal is complete, parties may voluntarily choose informal resolution (e.g., mediation or facilitated agreement) with the Title IX Coordinator approval. Administrative adjudication is one type of informal resolution.

Before starting, the Coordinator provides written notice explaining:

- The process and requirements,
- The facilitator,
- The impact on formal proceedings and rights, and
- Any additional consequences.

During informal resolution formal investigation/adjudication is paused and deadlines are suspended.

If resolution is reached and approved, it is put in writing and signed (except administrative adjudication). It is final and binding, with limited exceptions (e.g., fraud).

Key rules:

- Either party may withdraw at any time before final agreement.
- The process should be completed within 21 days (unless extended).
- If no resolution is reached, the case returns to the formal process.

Limitation: Informal resolution is not allowed if a non-student employee is accused of harassing a student.

Rights of the Parties in an Institutional Proceeding:

Both the accuser and the accused are entitled to the following during disciplinary proceedings:

1. Prompt, Fair and Impartial Process
 - The process must follow reasonable timelines, with extensions allowed for good cause (with written notice explaining delays).

- Procedures must be consistent with institutional policy and transparency.
- Both parties must receive timely notice of meetings and access to relevant information before hearings.
- Decision-makers must be free from conflicts of interest or bias.

2. Trained Officials

- Proceedings are conducted by officials who receive annual training on issues such as dating violence, domestic violence, sexual assault, and stalking.
- Training includes handling evidence, questioning techniques, procedural rules, and avoiding bias.
- Key staff (e.g., Title IX Coordinator and investigators) participate in specialized training programs.

Date	Event	Position
July 21-22, 2026	Advanced Title IX: The New Administration	Title IX Coordinator
TBD	Title IX Training	Deputy Title IX Coordinator

3. Advisor Participation

- Both parties have equal rights to bring an advisor of their choice to any proceeding.
- The institution may limit the advisor's role, as long as those limits apply equally to both parties.

4. Standard of Evidence

- Decisions are made using the preponderance of the evidence standard (i.e., more likely than not).

5. Notification of Outcomes

- Both parties receive simultaneous written notification of:
 - The result and rationale
 - Any sanctions imposed
 - Appeal procedures
 - Any changes to the outcome
 - When the decision becomes final

Possible Sanctions or Protective Measures that the College May Impose for Dating Violence, Domestic Violence, Sexual Assault or Stalking Offenses:

The College may implement protective measures and impose sanctions designed to ensure the safety of the complainant and the campus community, prevent the

recurrence of prohibited conduct, and remedy its effects. The College will provide written notification to complainants regarding available options for, and assistance in, changing academic, transportation, and working situations, as well as available protective measures.

Protective measures may include, but are not limited to, no-contact orders; limitations on contact between the parties; academic, transportation, workplace, clinical, internship, practicum, or field experience accommodations; changes to class schedules, clinical placements, work assignments, or work schedules; separation of the parties in classroom, laboratory, simulation, clinical, or workplace settings; counseling and support service referrals; safety planning; restrictions on access to College programs, activities, facilities, or property; interim suspension; administrative leave; and other appropriate protective or remedial measures.

Student sanctions may include educational requirements; written warnings or reprimands; restitution; probation; loss of privileges; suspension; dismissal from an academic program; or expulsion.

Employee sanctions may include educational requirements; written warnings or reprimands; reassignment of duties; demotion; suspension; termination of employment; or other corrective action permitted by College policy.

The College may also refer matters to law enforcement for investigation and possible criminal prosecution when warranted. If a complainant requests accommodation or protective measures and they are reasonably available, the College will provide them regardless of whether the complainant chooses to report the incident to campus security, local law enforcement, both, or neither.

Publicly Available Recordkeeping:

The College will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the College to the extent permitted by law.

Victims to Receive Written Notification of Rights:

When a student or employee reports to the College that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the College will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

Sex Offender Registration Program:

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the

state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Dean of Enrollment Management at (319) 226-2004. State registry of sex offender information may be accessed at the following link:
<https://www.iowasexoffender.gov/>

Timely Warnings & Emergency Response

Timely Warnings

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Dean of Enrollment Management, Executive Director of Business & Finance, and President constitutes a serious or continuing threat to members of the campus community, a campus-wide “timely warning” will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Dean of Enrollment Management, (319) 226-2004
- Executive Director of Business & Finance, (319) 226-2012 or (319) 610-4405

The College has communicated with local law enforcement asking them to notify the College if it receives reports or information warranting a timely warning.

Emergency Response

The College's Campus Security Authorities (CSAs) go through training once a year to review their role as a CSA and what constitutes emergencies or dangerous situations. The College has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to tornadoes, bomb threats, chemical spills, disease outbreaks, fires, active shooters, etc. The College has communicated with local police requesting their cooperation in informing the College about situations reported to them that may warrant an emergency response.

Students, staff and visitors are encouraged to notify the Executive Director of Business & Finance at (319) 226-2012 or (319) 610-4405 of any emergency or potentially dangerous situation.

The President, Executive Director of Business & Finance, and/or Dean of Enrollment Management, in collaboration with other appropriate personnel, will determine who

should be notified, and 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.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also, as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

Once the emergency is confirmed and based on its nature, the President, Executive Director of Business & Finance, and/or Dean of Enrollment Management will consult with other appropriate College officials to determine the appropriate segment or segments of the College community to be notified.

The President, Executive Director of Business & Finance, and/or Dean of Enrollment Management will access available sources of information from campus administrative staff and local authorities to confirm the existence of the danger and will be responsible for initiating the institution's response and for marshaling the appropriate local emergency response authorities for assistance. Depending on the nature of the emergency, other College departments may be involved in the confirmation process.

The Executive Director of Business & Finance will direct the issuance of emergency notifications, which will be accomplished using one or more of the methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

At the direction of the President, the College's Executive Director of Business & Finance will notify local law enforcement of the emergency if they are not already aware of it and local media outlets in order that the larger community outside the campus will be aware of the emergency.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the College issues a timely warning or emergency notification to the campus community.

Method	Sign Up Instructions
Finalsite/Connect Emergency Alert System: system can send phone, email and text messages	Sign up for current students is through the Anthology My Pulse system: login and go to edit profile where local information can be edited and is used for emergency alerts, sign up for faculty and staff is through the Business Coordinator.
Broadcasting speaker through Fire Alarm system	None Required

Method	Sign Up Instructions
Allen College Website: www.allencollege.edu	None Required

Testing & Documentation

The College tests its emergency response and evacuation procedures at least once a year by conducting drills/tests through our emergency alert system using texts, phone calls and/or emails. The on-campus fire panel speaker system may also be used for drills/tests. The drills/tests may be announced via emails in advance to faculty/staff and/or students, or they may be unannounced. The Emergency Management Team will meet to train, test and evaluate the College's emergency response plan.

The Dean of Enrollment Management maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the College will distribute to its students and employees information to remind them of the College's emergency response and evacuation procedures.

Stop Campus Hazing Policy and Programming

The College prohibits hazing, which is defined as any intentional, knowing, or reckless act committed by a person (alone or in concert with others) against another person or people (regardless of the other person's/people's willingness), that is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in a student organization; and causes or creates a risk of physical or psychological injury.

If you are a victim of hazing, go to a safe place and contact Dr. Joanna Ramsden-Meier, Dean of Enrollment Management at (319) 226-2004 or Joanna.Ramsden-Meier@allencollege.edu. You may also contact Campus Security at (319) 240-7189 or 911 if it is an emergency. Those who witness or hear about an incident of hazing are also encouraged to report in the same manner.

When a report of hazing is received involving student(s), the Dean of Enrollment Management will investigate the complaint in accordance with the Student Code of Conduct policy. The Student Code of Conduct shall govern all proceedings involving such a complaint. Sanctions, if appropriate, will be imposed in accordance with the Student Code of Conduct and the 2-D-100-01 Student Disciplinary Action policy. The Student Code of Conduct policy can be found at [2-C-800-07 Student Code of Conduct](#). The College strives to complete the investigation within 30 days.

Violations of this policy involving faculty, staff or other employees can be reported by contacting Denise Hanson, Executive Director of Business & Finance at (319) 226-2012 or Denise.Hanson@allencollege.edu for referral to, and investigation by Human Resources under the UnityPoint Health System Harassment, Workplace Violence, Bullying and Non-Retaliation, policy 2.HR.17.

Any violation involving a crime, an emergency, or an imminent threat to the health or safety of any person should be reported immediately by dialing 911 to reach local law enforcement officials of (319) 240-7189 for UnityPoint Health – Allen Security.

The College will report to law enforcement any complaint of hazing involving criminal conduct that creates a substantial risk to the health or safety of any person in the College community. Such reporting shall include, but not be limited to, criminal homicide, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, liquor law violations, drug law violations, and illegal weapons possession.

The College strongly encourages students to report alleged instances of hazing. Therefore, students who make good faith reports of alleged hazing and who cooperate fully in the student conduct process may not be subject to sanctions for self-reported hazing or other policy violations that may be brought to light in connection with the reported incident, unless the College determines that the violation was egregious. However, the College reserves the right to follow up and address those issues with the student's cooperation as appropriate in a non-disciplinary context. Further, the College cannot guarantee that, if the misconduct is reported to local law enforcement, the police will or will not act against an individual for unlawful acts. To receive amnesty, students must take the initiative to report and get assistance. Students who request amnesty after College staff is aware of the alleged violation or after inquiry by staff, law enforcement, or others will not be eligible for amnesty.

Retaliation: The College prohibits retaliation against any individual for the purpose of interfering with any right or privilege secured this policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or process under this policy. Retaliation violations shall also be investigated and adjudicated pursuant to the definitions, procedures, and appeal process in the Student Code of Conduct.

An individual may appeal the decision to (insert appropriate administrator) within 5 days of being notified of the decision. The appeal officer will render a decision within 14 days of receiving an appeal. The appeal officer's decision is final.

Hazing Prevention and Awareness Program

The institution provides prevention and awareness programming related to hazing (insert frequency and methods of training, such as computer modules, in person, brochures, etc.). The community is reminded that hazing is prohibited and is provided with information regarding how to file a report, how reports of hazing are investigated and information regarding local, state and tribal laws on hazing.

In addition, the institution provides research-informed programming for students and employees that covers a wide range of information designed to stop hazing before it occurs. It includes information regarding bystander intervention, such as how to take steps to watch out for those around you, as well as information regarding ethical leadership. Community members are also provided with information regarding how to strengthen group ties without engaging in hazing behavior.

Organization or team student leadership can emphasize anti-hazing values by modeling healthy community building and reiterating Allen College policies.

Student leaders can connect with professional anti-hazing experts to provide in-depth training.

Members can engage in active bystander intervention should they become aware of planned hazing – speaking up and letting others know these behaviors are not acceptable.

Hazing State Laws

Summary (Code of Iowa)									
1.									
a. A person commits an act of hazing when the person intentionally or recklessly engages in any act or acts involving forced activity which endanger the physical health or safety of a student for the purpose of initiation or admission into, or affiliation with, any organization operating in connection with a school, college, or university. Prohibited acts include, but are not limited to, any brutality of a physical nature such as whipping, forced confinement, or any other forced activity which endangers the physical health or safety of the student.									
b. For purposes of this section, “forced activity” means any activity which is a condition of initiation or admission into, or affiliation with, an organization, regardless of a student's willingness to participate in the activity.									
2. A person who commits an act of hazing is guilty of a simple misdemeanor.									
3. A person who commits an act of hazing which causes serious bodily injury to another is guilty of a serious misdemeanor. Iowa Code Ann. § 708.10.									

Crime Statistics

The statistical summary of crimes for this College over the past three calendar years follows:

Crime	On Campus			Non Campus			Public Property		
	2025	2024	2023	2025	2024	2023	2025	2024	2023
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	1	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	3	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0

Crime	On Campus			Non Campus			Public Property		
	2025	2024	2023	2025	2024	2023	2025	2024	2023
Robbery	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	1	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Hazing	0	0	0	0	0	0	0	0	0
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	1	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0

* The College does not have on-campus student housing facilities.

Hate crimes:

2025: No hate crimes reported.

2024: No hate crimes reported.

2023: No hate crimes reported.

Crimes unfounded by the College:

2025: 0 unfounded crimes.

2024: 0 unfounded crimes.

2023: 0 unfounded crimes.

Statistics for unfounded crimes provided by law enforcement agencies:

2025: 0 unfounded crimes.

2024: 0 unfounded crimes.

2023: 0 unfounded crimes.

Data from law enforcement agencies:

- The University was provided with some crime data from law enforcement agencies for which it cannot be determined whether any of the statistics apply to or include the College's Clery Geography.
- Certain law enforcement agencies did not comply with the College's request for crime statistics.