



**EASTERN SCHOOL**  
OF ACUPUNCTURE AND TRADITIONAL MEDICINE

# **Campus Security Program**

**Annual Report**

**2018 - 2019**

(Last revised September 2018)

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## **INTRODUCTION**

The Eastern School of Acupuncture prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act). This report is prepared in cooperation with local law enforcement agencies. Nothing in the law shall be construed to permit a school to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual with respect to the implementation of the Clery Act.

The College President compiles crime statistics annually in accordance with the Clery Act (The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act – click here for additional info: <http://clerycenter.org/summary-jeanne-clery-act> ) and to improve the safety and security of the Eastern School of Acupuncture. The Annual Security Report contains crime statistics, security policies, and safety regulations. This report is made available to current students and employees through electronic mailings and publication on the Eastern School of Acupuncture website [www.esatm.edu](http://www.esatm.edu) . All students and employees are informed that the Annual Security Report is available and may request a paper copy by contacting the Administration Office. A hard copy is distributed to all students and employees on an annual basis and a signed Acknowledgement of Receipt form is filed in the Campus Security Binder. The Campus Security Brochure and information on off-campus programs and resources are also readily available.

This Annual Security Report is reviewed annually by the College President to ensure that information is up-to-date and complies with federal and state regulations. ASR reviews completed by the College President are documented through meeting minutes and kept in the Campus Security binder. The Eastern School of Acupuncture's goals are to: foster safety and security through our policies and procedures, maintain and create a safe and secure working and learning environment, and collect and report crime statistics for the Eastern School community.

## **MISSION STATEMENT**

The purpose of the Eastern School of Acupuncture and Traditional Medicine is to offer professional training, education and services in acupuncture, Oriental medicine, and the traditional healing modalities that enhance the health and well-being of the greater community.

## **ESATM CAMPUS SECURITY POLICY**

The College does not tolerate violence or other threatening conduct against any members of the College community. This includes, but is not limited to: criminal acts against persons or property; harassment based on sex, race, ethnicity, or disability; sexual assault; domestic and dating violence; stalking; acts of violence against women; hate crimes; drug and alcohol use or possession on school premises; and firearm possession. The College will impose strict disciplinary actions such as, but not limited to, termination of employment or enrollment. The College will appropriately involve law enforcement officials, should any of the following occur on school premises or at school-sponsored events: acts of violence; sexual misconduct or harassment; or other threatening conduct.

Federal and state laws prohibit discrimination in employment. Title IX of the Education Amendments of 1972 (Title IX) prohibits discrimination on the basis of sex in education programs or activities. The Eastern School of Acupuncture does not discriminate on the basis of sex either in employment or in its academic programs or activities. The ESATM Campus Security Policy applies to all students, employees, and third parties regardless of sex, race, national origin, religion, age, or disability.

It is the College's mission to ensure and provide all employees and students with a safe workplace and learning environment, free of any type of unlawful assaults or discrimination. Security on campus is handled by the Administration Office, located on-campus, in Suite 500. It is College policy that students and employees shall report to the College President of any and all safety hazards, crimes, loss of property, significant illness, or injury. Proper reporting facilitates the apprehension of criminals and assists in making the entire campus safe. The College President is mandated to investigate incidents and to coordinate with local law enforcement agencies to apprehend those who violate these regulations or commit crimes on campus. The College President will determine proper sanctions that will be used to address crimes committed. Possible sanctions may include, but are not limited to, termination of employment or enrollment. When necessary, the College will press charges against criminal violators. The College will make all attempts to provide students and employees with a safe environment in which to study and work.

### **On Campus Security Director (Title IX Coordinator)**

Aida Morales-Almanzar | College President  
(973) 746-8717 ext. 15  
[amorales@esatm.edu](mailto:amorales@esatm.edu)  
440 Franklin Street, Suite 500  
Bloomfield, NJ 07003

### **Off Campus Security Directory**

**Emergency:** 9-1-1

**Non-Emergency:** Bloomfield Police Department

(973) 680-4141  
1 Municipal Plaza  
Bloomfield NJ 07003

Bloomfield Fire Department  
375 Franklin Street  
Bloomfield, NJ 07003  
(973) 680-4153

## **SAFETY PRECAUTIONS**

### **Student/Employee Responsibility:**

The support, cooperation, and involvement of all students and employees are essential for the overall success in implementing the School's safety and security efforts. To make the Eastern School of Acupuncture a safe place, be alert for suspicious persons and dangerous situations. Be cautious and aware of your surroundings. Be security-conscious by watching for others and their property. Be responsible and report all crimes, whether actual, attempted, or suspected, to the Administration Office.

### **Campus Facilities Access:**

The College has no residence halls. Students and employees have access to the campus building from 7am to 9pm. The doors to the building are opened and closed by Building Management. The entrance to the building is equipped with security cameras. Maintenance/Cleaning Staff also have keys for the school offices and classrooms. In the event of an emergency, please call 9-1-1 or the Local Police Department.

### **Risk Reduction Safety Tips for Students and Employees:**

While the College attempts to provide a safe and secure environment, students, faculty, staff and campus visitors are ultimately responsible for their safety. Safety is enhanced when students and employees take necessary precautions such as:

- Report all suspicious activities to the Administration Office immediately.
- Never take personal safety for granted.
- Avoid walking alone at night. Travel with a friend or companion.
- Avoid parking or walking in secluded or dimly lit areas.
- Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively.
- Carry only small amounts of cash.
- Never leave valuables (wallets, purses, books, computers, etc.) unattended.
- Carry your keys with you at all times and don't lend them to anyone.
- Lock your car doors and close the windows when leaving your car.
- Never leave valuables in your car especially if they are easily noticeable.
- Inventory your personal property and make records of the serial numbers of all items of value.
- Never admit anyone without a valid ID badge on campus/school premises.
- Office and room doors should be locked when rooms are unoccupied

A missing student notification policy is not mandated since the College has no campus housing facilities. If a student does not attend classes two days in a row, the School will call the student's home. If unable to speak with the student, the School will leave messages requesting he/she contact the College to indicate a reason for his/her absence.

As the College Administration becomes aware of relevant programs that address responsible practices and procedures that enhance personal safety, such information will be made available in the Administration office, on our school website under Campus Security, and distributed to students annually.

## **REPORTABLE CRIMES**

### **Definitions of Reportable Crimes:**

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

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

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

**Dating Violence:** The asserted violence by a person who has been in a romantic or intimate relationship with the victim. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.

**Domestic Violence:** The asserted violent misdemeanor and felony offenses committed by the victim's current or former spouse, current or former cohabitant, and person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.

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

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

**Forcible Rape:** The carnal knowledge of a person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her youth).

**Auto Theft:** The theft or attempted theft of a motor vehicle. This includes motor vehicle theft in all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned, including joyriding.

**Murder and Non-Negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.

**Negligent Manslaughter:** The killing of another person through gross negligence.

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

**Sex Offenses—Forcible:** Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent.

**Sex Offenses—Non-forcible:** Unlawful, non-forcible sexual intercourse.

**Stalking:** The course of conduct directed at a specific person that would cause a reasonable person to fear for her, his, or others' safety, or to suffer substantial emotional distress.

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

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

**Additional Clery Act Hate Crime Definitions:** In addition to any of the crimes above, the following acts are now reportable as Hate Crimes under the Clery Act, when motivated by prejudice on account of race, gender, religion, sexual orientation, ethnicity, or disability:

**Larceny-Theft:** The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

**Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

**Vandalism of Property (Except "Arson"):** To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

## **Other Important Definitions:**

**Consent:** To consent is a voluntary agreement to engage in sexual activity. Someone who is incapacitated cannot consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another. Consent can be withdrawn at any time. Coercion, force, or threat of either invalidates consent.

**Incapacitation:** Such as due to the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the student from having the capacity to give consent.

**Bias:** a pre-formed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation or ethnicity/national origin.



## **Sexual Assault:**

Sexual assault is any type of sexual contact or behavior that occurs without the explicit consent of the recipient. Falling under the definition of sexual assault are sexual activities as forced sexual intercourse, forcible sodomy, child molestation, incest, fondling, and attempted rape. Consent is when both parties give permission or an agreement has been established (*please refer to Consent definition*)

In the event of a sexual assault or domestic violence, please do the following:

- \* preserve any evidence of the assault (do not drink, bathe, change clothing, or comb hair, as this may destroy evidence that may be needed to prosecute the offender)
- \* go to a place that is safe from further attack and notify the police
- \* obtain immediate medical attention
- \* seek professional counseling

## **Sexual Harassment:**

Sexual harassment may be described as unwelcome sexual advances, requests for sexual favors and any other physical and expressive behavior of a sexual nature. Consent is when both parties give permission or an agreement has been established (*please refer to Consent definition*)

Unwelcomed sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals.
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

## **Hostile Environment Harassment:**

Refers to a situation where students and/or employees are subject to a pattern of exposure to unwanted sexual behavior that is so severe, persistent, or pervasive that it alters the conditions of education, employment, or participation in a school program or activity, thereby creating an environment that a reasonable person in similar circumstances and with similar identities would find hostile, intimidating, or abusive. An isolated incident, unless sufficiently severe, does not amount to a hostile environment caused by sexual harassment.

The College will assist the student in notifying law enforcement, if requested by the student who is the victim of a sexual assault. A report can be made and submitted to the College President for further investigation regarding the matter. In addition, the College President will provide information on off-campus agencies that provide services to victims of a sex offense. The school encourages students and employees to take advantage of the materials and programs that promote awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses available through the school and/or local community agencies. Information about such materials and programs is available upon request by the School, can be found on the school website under Campus Security, and is included in the distribution of the Annual Security Report.

## **Domestic Violence:**

Domestic violence involves a variety of serious offenses, including acts of violence, which are committed against someone by his or her current or former spouse or intimate partner, by a person with whom the parties have a child in common, a current or former cohabitant, or by someone who is similarly situated, such as person in a relationship or children with respect to their parent or guardian. Under New Jersey criminal law, domestic violence can include acts such as homicide, assault, terroristic threats, kidnapping, criminal restrain, imprisonment, sexual assault, criminal sexual contact, lewdness, criminal mischief, burglary, criminal trespass, harassment and stalking.

## **Dating Violence:**

Dating violence means violence committed by a person who is or has been in a social relationship or a romantic or sexual nature with another. It is determined based on the reporting party's statements, and in consideration of the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence includes, but it is not limited to, sexual or physical abuse or the threat of such abuse. It can include a pattern of behavior where one person threatens to use, or uses, physical, sexual, verbal or emotional abuse to control a dating or sexual partner.

## **Stalking:**

Stalking of any form is prohibited. Stalking is defined as "purposeful conduct directed at specific person that would cause a reasonable person to fear bodily injury to himself or family member and knowingly, recklessly, or negligently places person in reasonable fear of bodily injury or death to himself or family member." This can be anything from following someone around, calling regularly, sending unsolicited letters, or making other contact that causes fear.

## **VAWA (Violence Against Women Act):**

VAWA has improved the criminal justice response to violence against women by:

- holding rapists accountable for their crimes by strengthening federal penalties for repeat sex offenders and creating a federal "rape shield law," which is intended to prevent offenders from using victims' past sexual conduct against them during a rape trial;
- mandating that victims, no matter their income levels, are not forced to bear the expense of their own rape exams or for service of a protection order;
- keeping victims safe by requiring that a victim's protection order will be recognized and enforced in all state, tribal, and territorial jurisdictions within the United States;
- increasing rates of prosecution, conviction, and sentencing of offenders by helping communities develop dedicated law enforcement and prosecution units and domestic violence dockets;
- ensuring that police respond to crisis calls and judges understand the realities of domestic and sexual violence by training law enforcement officers, prosecutors, victim advocates and judges (VAWA funds train over 500,000 law enforcement officers, prosecutors, judges, and other personnel every year);
- providing additional tools for protecting women in Indian country by creating a new federal habitual offender crime and authorizing warrantless arrest authority for federal law enforcement officers who determine there is probable cause when responding to domestic violence cases.

## **Hate Crimes:**

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

The School reports all hate crime statistics separately for the categories of criminal offenses listed below.

Additionally, hate crimes statistics are also reported separately for the following offenses:

- **Larceny-theft:** is the unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Constructive possession is the condition in which a person does not have physical custody or possession but is in a position to exercise dominion or control over a thing.
- **Simple Assault:** is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **Intimidation:** is unlawfully placing another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- **Destructive/Damage/Vandalism of Property:** is willfully or maliciously destroying, damaging, defacing or otherwise injuring real or personal property without the consent of the owner or the person having custody or control of it.

## **Registered Sex Offenders:**

Those seeking to obtain information about registered sex offenders should visit the following website: [www.nsopr.gov](http://www.nsopr.gov). This information is being made available on the Internet to facilitate public access to information about persons who have committed a sex offense, to enable you to take appropriate precautions to protect yourself and those in your care from possible harm. Public access to registry information is intended solely for the protection of the public, and should never be used to threaten, intimidate, or harass another. Further, to the extent the State notifies an educational institution of information concerning registered sex offenders, the Family Educational Rights and Privacy Act (FERPA) does not prevent educational institutions from disclosing such information.

## **Drug and Alcohol:**

ESATM has a zero tolerance policy regarding alcohol and drugs on campus and will strictly enforce this policy. Controlled substances, such as marijuana and cocaine, are illegal by state and federal law. No one is to report for work or class evidencing any effects of alcoholic consumption or under the influence of drugs. The sale of alcoholic beverages or controlled substances is also prohibited on school premises. Anyone violating this policy will be removed from school property and disciplinary action will be taken. The local Police Department will also be notified of any findings of drugs.

Please refer to our Drug and Alcohol Manual which is reviewed by the school and distributed annually to each student and employee.

## **Firearms:**

Firearms, ammunition, explosives or other weapons are prohibited on school property. Exceptions to this policy are limited to the following instances:

- Department of Public Safety and other law enforcement agencies in performance of their normal duties may carry firearms on School property and
- TCLEOSE approved students.

Persons who do not comply with this policy are subject to disciplinary action and possible arrest by the appropriate police agency.

## **CAMPUS SECURITY PROGRAMS**

### **On-Campus Security Information:**

Access to information on our Campus Security is provided in the Annual Security Report (ASR). Annual distribution of ASR is documented through signed acknowledgment of receipts. Those interested can access the school's ASR and Campus Security Brochure on our School website or they can obtain a hard copy in the Administration office. The Campus Security Brochure contains outside referral programs for victims of certain crimes.

In the event that you should be a victim of a crime or witnessed a crime and wish to file a report, please contact the Title IX Coordinator or Local Police Department for assistance.

### **Campus Security Training:**

Responsible Employees and the Title IX Coordinator receive annual training on how to handle a situation in the event of a crime or emergency. Completion of Training certificates are filed in the Campus Security binder. Staff, faculty, and students are provided with the Campus Security Report Program annually. The document is reviewed with students during their orientation, and with staff and faculty as part of their ongoing training.

### **On-Campus Assistance:**

#### **On Campus Security Director (Title IX Coordinator)**

Aida Morales-Almanzar | College President

(973) 746-8717 ext. 15

[amorales@esatm.edu](mailto:amorales@esatm.edu)

440 Franklin Street, Suite 500

Bloomfield, NJ 07003

### **Off-Campus Programs:**

Essex County Rape Care Center ..... (877) 733-2273  
The National Sexual Assault .....800) 656-4673 / (800) 601-7200  
Jersey Battered Women's Services..... (973) 267-4763  
Rape/Sexual Violence 24-Hour Hotline..... (800) 656-HOPE

## **By Stander Intervention**

Bystander intervention is a term used to describe the interruption of behavior or speech by someone who is present or a bystander.

The following guide is intended to be used as an aid in identifying and properly responding to campus emergencies:

- Medical – Unconsciousness, physical injury, alcohol and/or drug overdose.
- Psychological – Suicidal and/or homicidal thoughts or behaviors, observation of serious depression or anxiety, and /or extreme grief.
- Physical – Altercations, assaults, violent outbursts, hysteria, threats, and/or vandalism.
- Sexual Assault – Rape or attempted rape.
- Building and Grounds – Damage to property/housing, major issues with utilities (water, gas, and electricity), etc.

If you are doubtful as to the nature of the situation or whom to call, contact the College President or Local Police Department for help.

If a student or employee is aware that a crime has been, or is being committed on school property or at a school sponsored event off-campus during the hours that the school is open, the crime should be reported as soon as possible to the Administration Office. The Administration Office is located at 440 Franklin Street, Suite 500, Bloomfield, New Jersey, 07003. Other emergencies should also be reported to the Administration Office. If the crime has been committed when the school is closed, it should be reported to the Administration Office as soon as possible when the College is open. In addition to reporting the crime to the Administration Office, the crime should be reported to local law enforcement authorities.

College personnel have the authority to determine whether individuals have lawful business at the college and may request identification to make that determination. In addition, they have the authority to ensure that college policies, such as break time and building access, are followed.

The College President will work with local law enforcement, as appropriate, when a crime is reported. Crimes reported to the Administration Office are included in the annual campus crime statistics. In addition, the college requests from the local police department crime information not reported to the Administration Office that is appropriate for inclusion in the annual campus crime statistics. Further, if circumstances warrant, the Administration will notify the Eastern community of any on-going threats related to a reported crime.

## **REPORTING A CRIME**

If you are the victim of a crime and do not want to pursue action through the school or the criminal justice system, you may still consider making a confidential report. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. Reports filed in this manner are included in the annual crime statistics for the college. The College President will inform persons of the procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. Depending on the crime, reports may be done either through the local police department or through the College.

In addition to any criminal sanctions, the School will impose appropriate disciplinary sanctions if the offender is a student or employee of the School. The College President should be contacted should one wish to file a report.

### **Gathering Evidence:**

To gather evidence when filing a report, make sure to preserve any evidence of the assault (do not drink, bathe, douche, smoke, change clothing, comb hair, or clean bed/linen where the assault occurred, since this may destroy evidence that may be needed to prosecute the offender). In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sexual misconduct are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with a school or police investigation.

### **Who to Contact:**

When a crime occurs, you should immediately contact the local police department and administration office. Seek medical attention if needed. When filing a report, contact the College President/ Title IX Coordinator or a designated "Responsible Employee". You also have the option to file a report with law enforcement. The College will assist the student in notifying law enforcement, if requested by the student who is the victim of a sexual assault. In addition, the College President will provide information on off-campus agencies that provide services to victims of a sex offense.

Title IX Coordinator Responsibilities include:

- Being knowledgeable and trained in the School policies and procedures and relevant state and federal law.
- Being available to advise individuals about School and local community resources and reporting options.
- Being available to provide assistance to school employees regarding how to respond appropriately to report of Title IX-related prohibited conduct and related retaliation.
- Ensuring effective implementation of school's sexual misconduct policies and procedures.
- Overseeing training, prevention, ~~and~~ education efforts, and annual reviews of climate and culture.
- Overseeing the School's response to Title IX reports and complaints and identifying and addressing any patterns or systemic problems revealed by such reports and complaints.
- Being informed of all reports and complaints raising Title IX issues, even if the report or complaint was initially filed with another individual or office or if the investigation will be conducted by another individual or office.

## Reporting to “Responsible Employees”:

A “responsible employee” is a College employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or anyone whom a student could reasonably believe has this authority or duty. When a victim tells a responsible employee about an incident of sexual violence, the victim has the right to expect the College to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. A responsible employee must report to the Title IX coordinator all relevant details about the alleged sexual violence reported by the victim. The College also will need to know the following pertinent details: the name of the victim and alleged perpetrator(s), any witnesses, the date, time and specific location of the alleged incident. To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the College’s response to the report. A responsible employee should not share information with law enforcement without the victim’s consent.

Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee’s reporting obligations. If the victim wants to maintain confidentiality, direct the victim to confidential resources. If the victim wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the victim that the College will consider the request, but cannot guarantee that the College will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the responsible employee will also inform the Coordinator of the victim’s request for confidentiality. Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim’s wishes, including any request for the College to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready. Please refer to Student Assistance Services for a list of Responsible Employees.

## Report Forms:

When filing a report, be sure to use the appropriate form. Forms for reporting are attached at the end of the Campus Security Program report. These forms are also available at the Administration Office. Below you will find a description of each form available for reporting campus security related crimes/incidents/concerns.

**Area of Concern Form:** An Area of Concern form can be filed by an instructor if the instructor has a concern regarding a student. This may include, but is not limited to, frequent tardiness, disruptive behavior, frequent absences, etc. This form should be filed as a preliminary warning to the student.

**Complaint Notice:** A Complaint Notice form can be filed by any member of the Eastern School Community when an individual has a complaint about another member of the community, or the College and where immediate action is needed. Such complaints may include, but are not limited to, cheating, plagiarism, disruptive behavior, theft, obstructive behavior, possession of drugs or alcohol on campus premises, etc.

**Discrimination Complaint Processing Form:** Any member of the Eastern School Community can file a discrimination Complaint Processing form when they feel they have encountered discrimination or harassment. Discrimination may include, but is not limited to, age, color, disability, gender, marital status, nationality, race, religion, sexual harassment, retaliation, etc.

**Incident Report:** An Incident Report can be filed by any member of the Eastern School Community. Incidents may include, but are not limited to, stalking, harassment, sexual misconduct, crimes, possession of drugs, alcohol, needle sticks, etc. on college premises-

### **Reporting Alleged Offenses:**

- An incident of sexual misconduct may be reported directly to the Title IX Coordinator.
- If the Title IX Coordinator is the alleged perpetrator of the sexual misconduct, an alternate person will be designated for reporting.
- Filing a report with the College does not obligate the victim to prosecute.
- The Title IX Coordinator will not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement.
- Before a victim reveals any information to the Title IX Coordinator, the Coordinator will ensure that the victim understands the Coordinator's reporting obligations
- An individual who has experienced an incident of sexual misconduct may report the incident at any time, regardless of how much time has elapsed since the incident occurred.

### **Confidentiality:**

The College encourages victims of sexual violence to talk to somebody about what happened – so victims can get the support they need, and so the College can respond appropriately.

Maintaining a victim's confidentiality is paramount. Each School employee is required to maintain a specific level of confidentiality as described below:

- Some employees are required to maintain near complete confidentiality; talking to them is sometimes called a "privileged communication."
- Other employees may talk to a victim in confidence. These employees generally only report to the College that an incident occurred without revealing any personally identifying information. Disclosures to these employees will not trigger a College investigation into an incident against the victim's wishes.
- Some employees are required to report all the details of an incident (including the identities of both the victim and alleged perpetrator) to the Title IX coordinator. A report to "responsible employees" constitutes a report to the College – and generally obligates the College to investigate the incident and take appropriate steps to address the situation.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual violence. The College encourages victims to talk to someone identified in one or more of these groups.



## **Non-Professional Counselors:**

Non-professional Counselors may include front desk staff and can generally talk to a victim without revealing any personally identifying information about an incident to the College. A victim can seek assistance and support from these individuals without triggering a College investigation that could reveal the victim's identity or that the victim has disclosed the incident. While maintaining a victim's confidentiality, these individuals or their office should report the nature, date, time, and general location of an incident to the Title IX Coordinator. This limited report – which includes no information that would directly or indirectly identify the victim – helps keep the Title IX Coordinator informed of the general extent and nature of sexual violence on and off campus so the coordinator can track patterns, evaluate the scope of the problem, and formulate appropriate campus-wide responses. Before reporting any information to the Title IX Coordinator, these individuals will consult with the victim to ensure that no personally identifying details are shared with the Title IX Coordinator.

A victim who speaks to a non-professional counselor or advocate must understand that, if the victim wants to maintain confidentiality, the College will be unable to conduct an investigation into the particular incident or pursue disciplinary action against the alleged perpetrator. Even so, these counselors and advocates will still assist the victim in receiving other necessary protection and support, such as victim advocacy, academic support or accommodations, disability, health or mental health services, and changes to living, working or course schedules. A victim who at first requests confidentiality may later decide to file a complaint with the school or report the incident to local law enforcement, and thus have the incident fully investigated. These counselors and advocates will provide the victim with assistance if the victim wishes to do so. While these non-professional counselors and advocates may maintain a victim's confidentiality vis-à-vis the College, they may have reporting or other obligations under state law.

## **Off-campus Counselors and Advocates:**

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the College unless the victim requests the disclosure and signs a consent or waiver form. Please refer to the Off-Campus Prevention and Awareness Programs section.

While these off-campus counselors and advocates may maintain a victim's confidentiality vis-à-vis the College, they may have reporting or other obligations under state law.

## **Requesting Confidentiality:**

If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the College must weigh that request against the College's obligation to provide a safe, non-discriminatory environment for all students, including the victim. If the College honors the request for confidentiality, a victim must understand that the College's ability to investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited. Although rare, there are times when the College may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students.

When weighing a victim's request for confidentiality and/or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including:

- the increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, based on one or more of the following: other sexual violence complaints about the same alleged perpetrator; the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence; the alleged perpetrator threatened further sexual violence or other violence against the victim or others; the sexual violence was committed by multiple perpetrators;
- whether the sexual violence was perpetrated with a weapon;
- whether the victim is a minor;
- whether the College possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
- whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors may lead the College to investigate and, if appropriate, pursue disciplinary action. If none of these factors are present, the College will likely respect the victim's request for confidentiality. If the College determines that it cannot maintain a victim's confidentiality, the College will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the College's response. The College will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or College employees, will not be tolerated.

The College will also:

- assist the victim in accessing academic support; disability, health or mental health services; and legal assistance both on and off campus (see portion of policy identifying these);
- inform the victim of the right to report a crime to campus or local law enforcement. When needed, the College will provide assistance to the victim in the reporting process.

If the school has credible information that the alleged perpetrator has committed one or more rapes prior to a specific incident, the balance of factors would compel the school to investigate the allegation and, if appropriate, pursue disciplinary action. The College may not require a victim to participate in any investigation or disciplinary proceeding. Because the College is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the College to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices. If the College determines that it can respect a victim's request for confidentiality, the College will also take immediate action as necessary to protect and assist the victim.

### **Anonymous Reporting:**

Although the College encourages victims to talk to someone, a person can call the Title IX Coordinator at 973-746-8717 ext. 15 for anonymous reporting. Stating personally identifying information may serve as notice to the College for the purpose of triggering an investigation.

## **Determining Jurisdiction:**

In order to ensure the smooth functioning of the Eastern School activities and to implement the principles expressed in the Policy on Student and Employee Conduct at the Eastern School and the Rules for the Maintenance of Public Order, the Administration has established the following procedures for disciplinary action:

### **Cases of Faculty Jurisdiction:**

**Board consists of Department Heads, Academic Dean, Clinical Director, and CEO**

1. Cheating, plagiarism, forgery of academic documents with intent to defraud.
2. Disruption of a lecture, clinic, or any other premises used for academic purposes.
3. Failure to return library books, or destruction of all or part of a library book or archival document.
4. Interference with access to classrooms, clinic, or academic offices.
5. Physical detention or restraint of a student, instructor, Eastern School staff member, or administrator while that person is attempting to exercise his/her duties.

### **Cases of Senate Jurisdiction:**

**Board consist of Student Body President, CEO, Director of Admissions, Chair of Governing Board, and Bursar**

1. Disruptive or riotous activity in the student lounge or student centers of nonacademic activity.
2. Forgery of instruments of identification with intent to defraud.
3. Theft of, or wanton damage to, the Eastern School property.
4. Engaging in conduct which interferes with or disrupts any academic function or prevents or limits the free expression of ideas, or which physically obstructs or restrains another member of the Eastern School community or a visitor.
5. Possession of drugs or alcohol on the Eastern School property.

(In order to remain fair and impartial, individuals who are involved in the complaint or are the complainant will recuse themselves from the appropriate disciplinary board.)

The Title IX Coordinator will ultimately determine whether disciplinary procedures are to be followed, and when necessary, under which jurisdiction, based on a review of facts reported. If law enforcement is involved, due to the severity of the incident/crime, the report procedure may differ.

## ***Filing a Notice of Complaint:***

Any member of the faculty, administration, staff or student body may file a complaint for any apparent violation of the policies or ethical practices of the Eastern School. The complaint must be submitted to the Title IX Coordinator.

1. Following the filing of the complaint, a preliminary review will take place by the Title IX Coordinator to determine its validity. If the preliminary investigation shows evidence of violations, the filing will be officially accepted and the disciplinary process will ensue.
2. Once a preliminary investigation is completed and the filing accepted, notice of the filing of the complaint shall be mailed to the person involved within fifteen (15) standard business days of receipt of the complaint.

### ***Investigation and Notice of Hearing:***

The Judicial Board reserves the right to conduct their own investigation of the charges against the person who is the subject of the complaint. If it is decided that a hearing should be held, the Judicial Board will send a written notice to the person advising him/her of the date and time of the hearing on their case. The hearing will take place at least seven days after the mailing date of notice, and all efforts will be made to set a date and time convenient to the student, to conduct the hearing expeditiously to rapidly determine whether the alleged infraction warrants a sanction.

If, after receiving the notice to attend the hearing, the person refuses to appear, the hearing will proceed and sanctions may be imposed in the person's absence.

### ***Interim Suspension:***

The Eastern School reserves the right to place a person on interim suspension, pending the investigation of the complaint, if it is determined that the seriousness of the alleged misconduct and the evidence supporting the complaint warrant immediate action. The person will remain on interim suspension until the College issues its final decision on the facts of the case.

### ***Hearings:***

The Judicial Board shall provide a hearing and make all disciplinary decisions on all complaints against a person within their jurisdiction.

The Judicial Board shall conduct all proceedings that it deems appropriate, including but not limited to the following:

- An audio recording will be made of all hearings and said recording will be preserved by the Executive Assistant to the CEO of the Eastern School until the complete resolution of the complaint.
- The person who is subject to a complaint has the right to be accompanied at the hearing by counsel or an advisor. The person and counsel or advisors have the right to question witnesses who may appear at the hearing and to examine all evidentiary material presented at the hearing. The Judicial Board reserves the right to call witnesses and present evidentiary material to determine the veracity of the complaint against the person. A written report of the final decision of the Judicial Board will be submitted to the Title IX Coordinator of the Eastern School and to the person who is the subject of the complaint within seven calendar days of the completion of the hearing. The report shall state all of the facts of the case; the decision arrived at by the Judicial Board, and the reasons for the decision.

### ***Post-Hearing Process:***

#### **Deliberation**

The Judicial Board will consider the evidence presented at the hearing and upon completion of the hearing and examination of the evidence, will make a determination as to the culpability of the person. If the complaint against the person is deemed to be valid, appropriate sanctions shall be determined by the Judicial Board. This determination phase of the hearing will typically occur immediately after the hearing; however, the Judicial Board reserves the right to adjourn the hearing and meet at a later time to determine its outcome.

## Appeals

1. A person who is subject to a disciplinary action as determined by a hearing has the right to appeal said decision by the Judicial Board if he/she feels the decision was not fairly determined.
2. The appeal must be in writing by the person, addressed to and received by the CEO of the Eastern School within fifteen (15) days of receipt of notice of the determination of the hearing.
3. The appeal process shall consist of a review of the hearing and all evidence supporting the determination, as well as any new evidence presented by the person in support of his/her appeal. A second hearing shall not be called on the case. Any change of the outcome of the hearing based upon the appeal shall be determined by the Judicial Board at their discretion, based upon any new data presented in the appeal. The decision of the Judicial Board at that point shall be considered the final determination of the case.

## Immediate Suspension

No person of the Eastern School shall be summarily suspended from the school without a full hearing. However, a person will be immediately suspended from the Eastern School in the event that the person either threatens violence or commits a violent act against another person in the school, is deemed to be guilty of sexual misconduct, poses a serious danger to another person in the school or to him or herself, or has been convicted of committing a criminal act.

## Re-Entry Policy for Students

If a student has been suspended or dismissed from the Eastern School and has been allowed to return to the College, and the duration of the time absent has been greater than one trimester, the student shall be required to take a re-entrance examination for appropriate placement within the program. Once the appropriate placement has been determined by the Academic Dean, the student's enrollment will be based upon the current tuition rate and per credit rate, if applicable. The student must sign a new enrollment agreement and a statement of intent. The student will be on probation for no less than one trimester.

## *Sanctions:*

The sanctions available include, but are not limited to, the following:

1. **Warning:** A warning is defined as the written communication to the person that the person is engaging in conduct that is deemed to be inappropriate or in violation of the standards and/or policy of the Eastern School. Said warning shall include the statement that if the person persists in said behavior, disciplinary action shall be warranted.
2. **Censure:** A censure is defined as a written reprimand to a person for behavior which violates a specific school regulation. The censure may include disciplinary action as determined by the Title IX Coordinator.
3. **Disciplinary Probation:** Disciplinary probation is defined as the determination of an infraction of a person serious enough to warrant excluding the person from participation in specific privileges and/or extracurricular activities stated in the notice of disciplinary probation for a specific period of time.
4. **Restitution:** If it has been determined that a person has damaged or misappropriated school property, reimbursement to the school for the cost of the damage or misappropriation may be demanded.
5. **Monetary Fine:** The Title IX Coordinator reserves the right to impose a monetary fine for appropriate infractions.

6. **Temporary Suspension:** The Title IX Coordinator reserves the right to temporarily suspend a person from the Eastern School classes, special privileges, or from work as set forth in a notice of disciplinary probation for a specified period of time.
7. **Dismissal from the Eastern School:** The Title IX Coordinator reserves the right to dismiss a person from attending the Eastern School for an indefinite period of time. This includes termination of employment. Certain conditions for readmission may be determined by the Title IX Coordinator.
8. **Transcript Notation:** The Title IX Coordinator reserves the right to affix a notation to a student's transcript indicating a disciplinary action. This transcript notation may be permanent or temporary, as determined by the Title IX Coordinator.
9. **Employee File Notation:** The Title IX Coordinator reserves the right to affix a notation to an employee file indicating a disciplinary action. This employee file notation may be permanent or temporary, as determined by the Title IX Coordinator.

For serious crimes, law enforcement sanctions will be determined by local police.

### ***Accommodations:***

The school will work with the victim, should it be requested, in making such changes as can reasonably be accommodated relative to the student's academic situation. The Academic Dean will formulate an Academic plan for the student.

### ***Disciplinary Proceedings:***

The school will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the school against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the school will provide the results of the disciplinary hearing to the victim's next of kin, if so requested. Compliance with this policy does not constitute a violation of FERPA.

The school does not have a campus police department or security office and therefore does not keep a daily crime log. However, the College President does keep an updated list of any criminal activity. This list is kept in the President's office in a binder. The information for the criminal activity list is retrieved from reports made of crimes to the Administration office concerning crimes that occurred on the premises, and from the crime statistics log of the local police department.

## Crime Statistics for our School for the Past Three Years

The following criminal offenses occurred during the calendar years listed.

CRIMINAL OFFENSES	2015	2016	2017	Location * C=campus N=non-campus	Hate Crime
Murder:/Non-negligent manslaughter: willful killing of one human being by another	0	0	0		0
Negligent manslaughter: The killing of another person through gross negligence.	0	0	0		
Forcible sex offenses (including forcible rape) Forcible is defined as any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent. Forcible Rape is the carnal knowledge of a person forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her youth)	0	0	0		
Non-forcible sex offenses: Unlawful non-forcible sexual intercourse	0	0	0		
Robbery: the taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.	0	0	0		
Aggravated assault: the unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm.	0	0	0		
Burglary: unlawful entry of a structure to commit a felony or theft.	0	0	0		
Motor vehicle theft: theft or attempted theft of a motor vehicle.	0	0	0		
Arson: The willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another.	0	0	0		0

VIOLATIONS	2015	2016	2017	Referred for campus disciplinary action (Y or N)
Liquor law violations	0	0	0	N
Drug law violations	0	0	0	N
Illegal weapons possession violations	0	0	0	N

\* Statistics are for both our prior campus at 427 Bloomfield Av. Montclair, NJ 07042, and current campus at 440 Franklin Street, Bloomfield, NJ 07003. This information is updated annually by October 1<sup>st</sup>. In order to prepare annual disclosure of crime statistics, a crime statistic request letter is sent to our local police department. The College President then submits the required information annually.

## **EMERGENCY RESPONSE AND EMERGENCY EVACUATION**

The College maintains an Emergency Response Operations Plan. The College may also test emergency response and evacuation procedures periodically through drills or exercises. Please contact the College President for further information.

### **Timely Warnings:**

In the event that an incident or series of incidents occur on the Eastern School campus that may affect the safety and security of the Eastern School community, the College will issue timely warnings. Timely warnings will be reviewed and issued by the College President. These timely warnings can be issued through various means such as Emergency Text Messaging, electronic mail, flyers on campus, and/or postings on the Campus Safety section of the Eastern School of Acupuncture website.

### **Emergency Response:**

The Eastern School will notify the campus community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to health or safety of students or employees occurring on campus. An immediate threat encompasses an imminent or impending threat, such as an approaching forest fire, or a fire currently raging in one of the school's buildings. Any employee, who perceives an immediate threat towards any other person on the school premises, is authorized to make an emergency call to 911. If an emergency situation should arise, the Eastern School community will be notified via e-mail, texting, phone, online, etc. Each student, upon entrance to the institution, will be required to supply the institution with both an e-mail address and a cell phone number.

The institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless doing so will, in the professional judgment of responsible authorities, compromise efforts to assist a victim, or to contain, respond to or otherwise mitigate the emergency. Instructors and/or staff members should remain in the room with their students if they are notified of a possible emergency.

The Emergency committee will confirm that there is a significant emergency, determine who to notify, determine content of the notification and initiate the notification system. The Emergency Committee will consist of the College President, the Academic Dean and the Director of Financial Aid. They will call the Police and/or Fire Department as needed.

The Clery regulations specify regularly scheduled drills, exercises and appropriate follow-through activities designed for assessment and evaluation of emergency plans and capabilities. The Eastern School will test and evaluate its emergency response and evacuation procedures at least once a year. These procedures will be publicized and documented.



## **Emergency Evacuation:**

During an emergency evacuation, each instructor is responsible for the safe and orderly evacuation of his/her class. Instructors not in class should assist with any evacuation problems that may arise. It is the instructor's responsibility to prevent panic, control traffic, and provide calm leadership.

The following guidelines should be observed:

- Instructors should know the shortest route from the classroom to the nearest exit.
- When the need to evacuate the building arises, the class should be directed to move single-file through the nearest exit and well beyond the building to an area of safety.
- The instructor should be last to leave in order to check that all students are out of the classroom and to close the door.
- Never return to the building until instructed to do so by the appropriate authorities.

Please refer to the College evacuation map.



THE EASTERN SCHOOL  
EVACUATION ROUTE

## **SOLVENTS AND CHEMICAL HAZARDS**

All chemicals and solvents are treated as potential hazards from initial delivery to ultimate use and require the use of safe practices at all times.

Anyone handling flammable liquids or chemicals of any type should wear appropriate protective clothing and will comply with industry safe practices and the safety instructions on the container label in regards to both the use and storage of these materials.

Chemicals and materials with toxic fumes are to be used only in well-ventilated areas.

### **Responsibility:**

It is the responsibility of everyone to be aware of the hazards related to the use of solvents, chemical cleaning materials, and other chemicals and to enforce the rules related to their use.

Hazards to be considered when using solvents, chemical cleaning materials, and other chemicals are:

- Contact with a hazardous material can cause skin rash or dermatitis, corrosive burns or eye damage.
- The potential of an explosion or a fire hazard.
- The danger of ingestion of a poisonous, corrosive, or hazardous substance through the mouth or absorbed through the skin.
- The inhalation of a volatile solvent, gas or toxic dust which may produce asphyxiation, intoxication, or damage to mucous membranes and internal organs.

### **Housekeeping:**

Good housekeeping is essential to safe operation. It will result in fewer accidents and will reduce fire hazards. All spills should be cleaned up promptly to eliminate slipping and fire hazards. All work areas must be kept free of debris and other objects which create hazards. Before leaving a classroom, be sure the area is clean and neat.

### **Injuries or Accidents:**

- Any injury which occurs at school, no matter how slight, or any accident that causes damage to property must be reported immediately to the School Director. All injuries and accidents should be reported to the Supervisor/Instructor by the end of the day.
- If anyone observes another who is about to endanger him/her self, another person, or property while at the School, they should intervene immediately in such a way as to not endanger themselves.
- Liquids such as water or oil, excessive dust/dirt, or any other debris spilled on floors presents serious slipping hazards and should be cleaned up immediately upon observation.

### **First Aid:**

First aid procedures vary depending on the chemical nature of the materials in question. Follow the instructions on the container label.

In the event that a person should come in contact with solvent or chemicals in the eyes or on the skin, the affected area should be irrigated for a minimum of fifteen (15) minutes.

If anyone ingests chemical materials or is splashed with a hazardous material and irrigation facilities are not available, they should immediately be referred to a hospital emergency room.

### **Accident Investigation and Reporting:**

Anyone who suffers an injury during school shall promptly report such injury to the Supervisor/Instructor no later than end of the period on the day in which the injury occurred.

Every accident shall be investigated to determine the cause and the steps needed to prevent a recurrence. It shall be the responsibility of the Supervisor/Instructor to obtain the complete and detailed facts of the accident as soon as possible after it occurs and file an Exposure Incident Investigation form to submit to the Administration office.

## **SEVERE WEATHER**

### **Tornado:**

If (in the judgment of the College President) the threat of impending danger warrants it, the following actions may be taken:

- Dismissal of all classes and assembly of students and employees into interior hallways and away from glass windows, doors and partitions.
- Everyone should remain in these “safe” areas until, in the opinion of the President, the threat of danger is past.
- If the tornado or destructive wind strikes the building, everyone should sit on the floor, with backs against the wall, their heads between their knees, and their hands clasped over the backs of their heads until all danger is past.

### **Flooding:**

Because of the elevation of the School, our school is not likely to flood. However, during periods of flooding, the College President will remain in contact with appropriate authorities and will keep both students and employees advised of local road conditions.

### **Ice and Snow:**

In the event that ice and/or snow threaten to make highway travel hazardous, the College President may dismiss classes to allow commuters to return home safely.

### **School Closing Due to Inclement Weather:**

Only the College President has the authority to close the School. When this action is taken, the President will notify the students and faculty by leaving a phone message on the School’s phone system, posting the

notification of closing on the school website, sending a mass text message alert, and/or sending a mass email.

### **Self-Determination Policy:**

No student will attempt to attend class and no employee will report to work if, in their opinion or according to the warning of law enforcement officials, travel conditions in their area are unsafe (or if other circumstances would place their lives/health in jeopardy).

## **CRITICAL INCIDENT RESPONSE PLAN**

### **What is a Critical Incident?**

A critical incident is a situation where one or more students or employees at the Eastern School of Acupuncture create a major disruption of normal operations that requires a response beyond normal school operational procedures. Examples may be situations such as natural/structural disasters, violent behavior or life threatening injury or illness.

*(Note: During an actual critical incident, variations might be made depending on the nature of the event and the situation.)*

### **Objectives:**

The purpose of an Incident Response plan is to enable the Eastern School of Acupuncture to:

1. Coordinate the School's response to critical incidents while paying special attention to the safety and security needs of members of the School's community.
2. Maintain the safety and security of faculty, staff and students as a whole in the event of a critical incident.
3. Provide counseling, guidance, and appropriate support services to the families, friends, students, and campus community members in the event of a critical incident.

<b>Critical Incident Response Team (CIRT)</b>			
CEO/President	Aida Morales-Almanzar	amorales@esatm.edu	973-746-8717 ext. 15
Academic Dean	Thomas Kouo	tkouo@esatm.edu	973-746-8717 ext. 14
Director of Financial Aid	Jennifer Coppola	jcoppola@esatm.edu	973-746-8717 ext. 13

## **Critical Incident Response Plan Procedures:**

**Step 1:** The College President is notified of a critical incident involving a student or employee at (973) 746-8717 ext 15 during office hours.

First responders may call 911 if they determine that immediate medical attention is necessary. Once emergency services have been contacted, all steps in this process must be followed.

**Step 2:** The College President gathers information concerning the critical incident and responds accordingly.

In the event that scheduled classes need to be cancelled or altered in some manner, the College President will contact the faculty. The College President will contact the students and the closure will be posted on the college website at [www.esatm.edu](http://www.esatm.edu)

**Step 3:** Depending on the evaluation of the situation, one or more of the following may occur:

- **Step 3A** – Without delay, the College will take into account the safety of the community, determine the content of the notification and initiate the notification system, unless the notification, in the professional judgment of responsible authorities, compromises efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency. The College President will go to the scene of the incident to assess the need for back-up personnel. Based on the initial findings and upon agreement with the College President, the response may include: dealing with the situation alone, contacting appropriate outside agencies (e.g. local police, hospital), contacting family members, or contacting a counseling center.
- **Step 3B** - If warranted, an emergency meeting of the Critical Incident Response Team (CIRT) may be called after evaluation of the situation with the consent of the College President. Current contact information for the CIRT will be posted on the school website.
- **Step 3C** – College President will initiate contact with families.
- **Step 3D** - CIRT Command Headquarters will be activated in the President's Office. The Crisis Center (if activated) will be located in the Administration office. The CIRT Command Head Quarters will communicate directly with the Crisis Center on activities and communications to be carried out.
- **Step 3E** – An emergency CIRT meeting will be called, during which it will be determined whether the CIRT will assist the College President in dealing with the critical incident. This may include: assisting affected student or employee's family members, counseling students or college employees, gathering additional information, etc.

**Step 4:** Once the issue/situation is under control, the CIRT will meet and debrief. Any needed follow-up plans, communications, activities, and/or programs will be determined for final resolution of the critical incident. Timelines for these activities are determined and a closure/evaluation meeting of the CIRT will be scheduled. CIRT will evaluate all responses to the critical incident at the closure/evaluation meeting.

**Step 5:** The CIRT will recommend to the College President any policy revisions in procedures and will compile a Critical Incident Report to be filed.

## **STUDENT ASSISTANCE SERVICES**

### **Personal Counseling Referral:**

The CEO/President of Eastern School of Acupuncture acts as the referral agent for students seeking assistance for emotional or personal counseling services.

### **On-Campus Contact Directory:**

**Eastern School of Acupuncture  
Student Services | Administration Office**  
440 Franklin Street, Suite 500  
Bloomfield, NJ 07003

**Campus Security Director/ Title IX Coordinator**  
Aida Morales-Almanzar, CEO | President  
973-746-8717 ext. 15

**Responsible Employees:**  
Aida Morales-Almanzar, CEO | President  
Jennifer Coppola, Director of Financial Aid

**Emergency Committee**  
Aida Morales-Almanzar, CEO | President  
Dr. Thomas Kouo, Academic Dean  
Jennifer Coppola, Director of Financial Aid

### **CIRT Members**

Aida Morales-Almanzar, CEO | President  
Dr. Thomas Kouo, Academic Dean  
Jennifer Coppola, Director of Financial Aid

### **School Crisis Center:**

When a critical incident involves responses from a variety of personnel, a Crisis Center will be established in the Administration building. The CIRT Command Headquarters (HQ) will communicate with the Crisis Center to coordinate all activities involved in the responses to the critical incident. Communications involving responding personnel will be communicated through this Crisis Center by the Center Head as directed by the CIRT. The President will assign the Center Head of the Crisis Center when a situation arises. The Center head is responsible for gathering any documents and/or necessary equipment.

## **Off-Campus Prevention and Awareness Programs**

Awareness programs are programs to inform the public of basic information about certain crimes and how to identify these crimes. Prevention programs are programs that assist victims of certain crimes by providing support, information, and techniques for preventing such crimes.

### ***Nearby Medical Facilities:***

Mountainside Hospital, Montclair NJ  
973-429-6000  
Clara Mass Hospital, Belleville NJ  
973-450-2000  
Planned Parenthood (Pregnancy)  
973-622-3900  
Birthright (Pregnancy)  
973-743-2061  
East Orange Primary Care (HIV Testing)  
973-675-1900  
East Orange Crisis Intervention (Mental Health)  
973-672-9685  
Community Health Care Counseling for Belleville (Mental Health)  
973-450-3100  
Alcohol Rehab Guide  
<https://www.alcoholrehabguide.org/>

### ***Community Facilities***

Essex County Family Violence Program  
973-484-4446  
Domestic Violence Services (UMDNJ)  
973-972-6421  
NCJW Center for Women  
973-994-4994  
Safe House  
973-759-2154  
NJ Bias Crime Hotline  
1-800-277-BIAS (2427)  
National Suicide Prevention Hotline  
1-800-273-8255  
Mental Health Cares  
1-866-202-4357  
National Sexual Assault Hotline  
1-800-656-4673  
National Domestic Violence Hotline  
1-800-799-SAFE  
GLBTQ Domestic Violence Project  
1-800-832-1901

### **Stalking Resource Center**

<http://www.victimsofcrime.org/our-programs/stalking-resource-center>

### **Student Resources on Sexual Assault**

<https://www.notalone.gov/>

<http://endrapeoncampus.org/>

Visit <https://rainn.org/get-information/links> for more Awareness and Prevention programs.



**Eastern School of Acupuncture and Traditional Medicine**

**INCIDENT REPORT**

**Name** \_\_\_\_\_

**Date** \_\_\_\_\_

Please describe the incident in detail. Be specific and give place and date:

What evidence, if any, was preserved of the incident?

Please describe any action you took following this incident. Be as specific as possible.

Who was contacted regarding the incident?

Additional information (optional):

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**Administration Signature**

# DISCRIMINATION COMPLAINT PROCESSING FORM

**INSTRUCTIONS:** This complaint form should be filed with the College President or a Responsible Employee at The Eastern School of Acupuncture and Traditional Medicine pursuant to the School's Policy Prohibiting Discrimination and Harassment.

1. Name:	2. Home Address:			
3. Telephone (Home):	4. Position			
5. Date(s) of discriminatory action(s):	6. Full Name & Title of person(s) you believe discriminated against you:			
<p>7. Basis of Discrimination:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; vertical-align: top; padding: 2px;"> <input type="checkbox"/> Age  <input type="checkbox"/> Affectional/Sexual Orientation  <input type="checkbox"/> Ancestry  <input type="checkbox"/> Atypical Hereditary Cellular or Blood Trail  <input type="checkbox"/> Color  <input type="checkbox"/> Creed  <input type="checkbox"/> Disability  <input type="checkbox"/> Domestic Partnership Status                 </td> <td style="width: 33%; vertical-align: top; padding: 2px;"> <input type="checkbox"/> Familial Status  <input type="checkbox"/> Gender Identity or Expression  <input type="checkbox"/> Genetic Information (including refusal to submit to or provide results of a genetic test)  <input type="checkbox"/> Liability for Military Service  <input type="checkbox"/> Marital Status  <input type="checkbox"/> Nationality                 </td> <td style="width: 33%; vertical-align: top; padding: 2px;"> <input type="checkbox"/> National Origin  <input type="checkbox"/> Race  <input type="checkbox"/> Religion  <input type="checkbox"/> Sex/Gender (incl. pregnancy)  <input type="checkbox"/> Sexual Harassment  <input type="checkbox"/> Retaliation (for having filed a discrimination complaint, participating in a complaint investigation, or for opposing a discriminatory practice)                 </td> </tr> </table>		<input type="checkbox"/> Age <input type="checkbox"/> Affectional/Sexual Orientation <input type="checkbox"/> Ancestry <input type="checkbox"/> Atypical Hereditary Cellular or Blood Trail <input type="checkbox"/> Color <input type="checkbox"/> Creed <input type="checkbox"/> Disability <input type="checkbox"/> Domestic Partnership Status	<input type="checkbox"/> Familial Status <input type="checkbox"/> Gender Identity or Expression <input type="checkbox"/> Genetic Information (including refusal to submit to or provide results of a genetic test) <input type="checkbox"/> Liability for Military Service <input type="checkbox"/> Marital Status <input type="checkbox"/> Nationality	<input type="checkbox"/> National Origin <input type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Sex/Gender (incl. pregnancy) <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Retaliation (for having filed a discrimination complaint, participating in a complaint investigation, or for opposing a discriminatory practice)
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8a. Explain why you feel you have been discriminated against: <input type="checkbox"/> CHECK IF ADDITIONAL SHEETS ARE ATTACHED				
8b. Were the actions or behavior you are complaining about directed at, or said to you and/or another party (third party harassment)? _____				
8c. Was the incident reported to anyone? Yes___ No___ If yes, who and when? _____				
8d. What remedy or resolution are you seeking? _____				
8e. Would you be willing to participate in mediation or another type of informal resolution process? <input type="checkbox"/> Yes <input type="checkbox"/> No				
8f. Complainant's Signature _____ Date: _____				
<b>DO NOT WRITE BELOW THIS LINE</b>				
<b>Director of Administration:</b>	<b>Date:</b>			
<b>Signature:</b>	<b>Received:</b>			

**COMPLAINT NOTICE**

**I, the undersigned, do hereby file this Complaint Notice against \_\_\_\_\_  
(student, faculty/clinic supervisor, staff, school).**

Submitted by: \_\_\_\_\_

Submitted to: \_\_\_\_\_

Date: \_\_\_\_\_

Type of Complaint: \_\_\_\_\_

**Cases of Faculty Jurisdiction.**

1. Cheating, plagiarism, forgery of academic documents with intent to defraud.
2. Disruption of a lecture, clinic, or any other premises used for academic purposes.
3. Failure to return library books, or destruction of all or part of a library book or archival document.
4. Interference with access to classrooms, clinic, or academic offices.
5. Physical detention or restraint of a student, instructor, Eastern School staff member, or administrator while that person is attempting to exercise his/her duties.

**Cases of Senate Jurisdiction.**

1. Disruptive or riotous activity in the student lounge or student centers of nonacademic activity.
2. Forgery of instruments of identification with intent to defraud.
3. Theft of, or wanton damage to, the Eastern School property.
4. Engaging in conduct which interferes with or disrupts any academic function or prevents or limits the free expression of ideas, or which physically obstructs or restrains another member of the Eastern School community or a visitor.
5. Possession of drugs or alcohol on the Eastern School property.

**Student Information (can be filled out by ESATM staff if unknown)**

Name:
Date of Birth:
Address:
Phone Number:
Current Cohort :

**School Information**

Name of Representative or Contact (if known):
Mailing Address of School or Agency Central Office:

Describe the **nature of the problem** (the concerns that led you to submit this complaint), including all **specific facts** relating to the complaint. Attach additional pages or supporting documents as necessary.

**Subject of the Complaint:**

**Proposed Solution:**

State your **proposed solution** to the problem based on your current knowledge of the situation. Attach additional pages or supporting documents as necessary.

### **PRIVACY STATEMENT**

The information requested on this form will be used to investigate and respond to your complaint. In our effort to resolve the issue, this information may be disclosed to the Faculty Jurisdiction or Senate Jurisdiction depending on the type of complaint.

### **DISCLAIMER**

I wish to file a complaint against the named in this complaint form, with the understanding that ESATM may conduct an investigation on my behalf. However, I understand that ESATM does not have the authority to act as my representative in the subject matter of this complaint. I understand that completion of this form is voluntary, but failure to provide requested information and/or failure to sign this form may delay or preclude investigation of my complaint. I understand that, as part of ESATM's investigation on my behalf, a copy of this form may be forwarded to the subject of the complaint or other third-parties as referenced in the Privacy Statement above.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_  
(Signature required. Unsigned complaints will be returned and will not be processed.)

**EASTERN SCHOOL OF ACUPUNCTURE AND TRADITIONAL MEDICINE**

**AREA OF CONCERN FORM**

**Instructor Name:** \_\_\_\_\_ **Course:** \_\_\_\_\_

**Student Name:** \_\_\_\_\_ **Class/Group:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Please describe the area of concern for this student:**

**Recommended action:**

**Student printed name/signature/date:** \_\_\_\_\_

**Instructor printed name/signature/date:** \_\_\_\_\_

**Received by administration:** \_\_\_\_\_

**CAMPUS SECURITY PROGRAM HANDBOOK**  
**Acknowledgement Receipt**

I have received a copy of the Campus Security Program Handbook. I understand the importance of campus security and the resources available to me.

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Signature

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Print Name

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Date