

A photograph of a Tulane University campus scene. A large, leafy tree dominates the foreground and middle ground. In the background, a brick building with arched windows is visible. Several students are walking on a path, and one student is riding a bicycle. The text is overlaid on the right side of the image.

Tulane University

ANNUAL SECURITY & FIRE SAFETY REPORT

2024-2025 ACADEMIC YEAR

**Includes Policy Statements for the 2024-2025 Academic Year and
Crime Statistics for Calendar Years (CYs) 2022, 2023 & 2024**

Message from the Chief of Tulane Police

To the University Community,

On behalf of the Tulane University Police Department (TUPD), I would like to thank you for taking the time to review our Annual Security and Fire Safety Report (ASR). Each year, TUPD publishes the ASR to provide important information about the safety and security measures that support our campus community. This report reflects our continued commitment to transparency, accountability and compliance with the Jeanne Clery Campus Safety Act, or the Clery Act.

At Tulane, we promote a culture of safety by partnering with departments across the university and maintaining a strong focus on community policing. These collaborations allow us to address concerns more effectively, build trust and ensure that safety efforts are responsive to the needs of our students, faculty and staff.

The ASR reflects our ongoing commitment to health and safety across campus. I encourage you to review the policies, procedures and resources it contains and to take an active role in helping keep our university community safe.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Young".

Frank Young
Tulane University
Chief of Police

Introduction

This document has been written to establish policies and procedures to comply with the Jeanne Clery Campus Safety Act, hereafter referred to as the “Clery Act,” and formerly known as the Crime Awareness and Campus Security Act of 1990 (Title II, Public Law 101-542) as amended. It is updated and published by Oct. 1 of each year and distributed to all students, staff and faculty via email as Tulane University’s Annual Security and Fire Safety Report as required by the Clery Act.

In November 1990, the Crime Awareness and Campus Security Act (Title II, Public Law 101-542) was signed into law. This law requires universities to produce and make available certain policy statements and statistics about campus crime. In November 1999, this Act was renamed the Jeanne Clery Disclosure of Campus Crime Statistics Act. Then in December 2024, this Act was renamed to the Jeanne Clery Campus Safety Act or, simply, the Clery Act.

Tulane University’s policy is to publish an annual security report by the deadline set by the U.S. Department of Education, typically Oct. 1, to inform current students and employees of its safety and security policies, procedures, and practices. Our annual report will also disclose statistics from the previous three years concerning reported crimes that occurred on campus, in certain off-campus buildings or property either owned or controlled by the university and owned or controlled by student organizations recognized by the university and on public property within or immediately adjacent to and accessible from the campus.

Under the Act, institutions must provide survivors of sexual assault, domestic violence, dating violence and stalking with options such as changes to academic, transportation, living or working situations and assistance in notifying local law enforcement, if the student or employee chooses to do so. It also provides both parties in a campus disciplinary process with certain rights. The ASR is available for all students, faculty and staff, as well as prospective students and employees. Anyone wishing to obtain a paper copy of the full report may request one by calling 504- 865-5381 or by mailing a request to:

Elizabeth Williams, JD
Director of Clery Compliance
6823 St. Charles Avenue
Diboll Complex, Bldg. #103
New Orleans, LA 70118

NOTICE: The links in this report are current at the time of publication. If any links are changed or updated after the publication date, they may no longer work. To find updated information or publications, please use a search engine or contact the Clery Act Coordinator for assistance.

Tulane University Director of Clery Compliance

The Director of Clery Compliance works collaboratively with various offices at the university to ensure the institution's compliance with the Jeanne Clery Campus Safety Act and associated regulations. By Oct. 1 of each year, the university must publish and distribute its Annual Campus Security Report to current and prospective students and employees. This report is required to provide crime statistics for the prior three years, policy statements regarding various safety and security measures, campus crime prevention program descriptions and procedures to be followed in the investigation and prosecution of alleged sex offenses.

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Clery Act Resources:

<http://clerycenter.org/>

<https://www2.ed.gov/admins/lead/safety/handbook.pdf>

<http://www.acenet.edu/news-room/Documents/A-Presidents-Guide-to-the-Clery-Act.pdf>

**2024-2025 Academic Year
Annual Security and Fire Safety Report
Prepared by the Tulane University Police Department and Includes Policy Statements for the 2024-
2025 Academic Year and Crime Statistics for Calendar Years (CYs) 2022, 2023 & 2024**

PREPARATION OF THE ANNUAL SECURITY REPORT AND DISCLOSURE OF CRIME STATISTICS

The Director of Clery Compliance, in consultation with the Tulane University Police Department (TUPD), prepares this report to comply with the Jeanne Clery Campus Safety Act using information maintained by TUPD, information provided by other university offices such as The Division of Student Affairs, The Office of the Provost, all Campus Security Authorities and information provided by local law enforcement agencies surrounding each academic campus.

This report provides statistics for the previous three years (2024, 2023, and 2022) regarding reported crimes that occurred on campus, in certain off-campus buildings or property owned, leased or controlled by Tulane. This report also includes institutional policies concerning campus security, such as policies regarding sexual assault, alcohol and narcotics and missing persons. The statistical information in this report applies to the uptown campus in New Orleans, the downtown campus and the Tulane National Primate Research Center. Additional information is available on our website: <https://publicsafety.tulane.edu>.

The university distributes a notice of the availability of this Annual Security and Fire Safety Report by Oct. 1 of each year to every member of the university community. Anyone, including prospective students and employees, may obtain a copy of this report by contacting TUPD at 504-865-5381 or by visiting <https://publicsafety.tulane.edu/clery-act>.

REPORTING CRIMES AND OTHER EMERGENCIES

Criminal incidents or any on-campus emergency should be reported immediately to TUPD by dialing 55911 from any campus phone or 504-865-5911 from any cellular phone. For non-emergencies please dial 55381 from any campus phone or 504-865-5381 from any other device. Upon receipt of a call, the TUPD ECC can supply information or dispatch officers as appropriate. Electronic reporting is available via the TUPD website at: <https://publicsafety.tulane.edu/tupd-online-reporting>. Regardless of how and where you decide to report these incidents, it is critical for the safety of the entire university community that you immediately report incidents to the TUPD to ensure an effective investigation and appropriate follow-up actions, which may include issuing a Timely Warning or Emergency Notification. Stay on the line so the dispatcher can get the information needed. An officer will be dispatched quickly, or the reporting party may be asked to come by the office located in the Collins C. Diboll Complex, the uptown station located at 1036 Broadway St. or the downtown station located at 1201 Tulane Ave. TUPD is open 24/7. To report an emergency to the New Orleans Police Department (NOPD), call 911 while in Orleans Parish. For other Tulane University campuses, see the separate sections at the end of this report for additional information, including calling 911 to report crimes.

All TUPD incidents involving students are forwarded to the Division of Student Affairs for review and potential action, as appropriate. TUPD or other agency investigators will investigate a report when it is deemed appropriate.

If assistance is required from NOPD or the New Orleans Fire Department (NOFD), TUPD will contact the appropriate unit. If a sexual assault or rape should occur, staff on the scene, including TUPD, will offer the victim a wide variety of services and resources. However, NOPD will generally be the primary investigating agency for most sex crimes occurring in Orleans Parish. TUPD has a Support Services Unit that has staff available to answer questions and assist victims in identifying and obtaining the necessary resources. Additionally, TUPD will notify the Student Affairs On-Call Professional, who is available 24/7 and available to provide additional support and resources for students.

Voluntary, Confidential, & Anonymous Reporting

We encourage university community members to report crimes promptly and to participate in and support crime prevention efforts. All crimes should be promptly and accurately reported to the campus police and the appropriate law enforcement agencies when the victim of such crime elects to or is unable to make such a report. The university community is much safer when all community members participate in safety and security initiatives.

Tulane recognizes that confidentiality is particularly important to survivors, victims and witnesses of all crimes. University students and community members have several options to seek support and/or report a crime. These options fall into three categories: confidential, private and anonymous.

- **Confidential:** These resources are strictly confidential. Except in rare, extreme circumstances, nothing will be shared without your explicit permission. Exceptions to strict confidentiality are when the provider believes you are a threat to yourself or others. We encourage all victims and survivors to seek counseling to help process their experience and to begin the recovery process. Examples of confidential resources include Counseling and Psychiatric Services (CAPS) and the Line.
- **Private:** These conversations are kept as private as possible, but information must be shared with key staff members so that the university can offer resources and accommodations and take action if necessary for reasons of safety. In planning any resource, the wishes of the person are given full consideration. Examples of private resources include Case Management and Victim Support Services and Student Affairs Professional On-Call.
- **Anonymous:** Anonymous reporting is an option if you do not want to be identified as the Complainant. However, you should realize that anonymous reports may not receive immediate attention and must include sufficient detail for the appropriate officials to be able to investigate if warranted.

If you are the victim of a crime and do not want to pursue action within the university system or the criminal justice system, you may still want to consider making an anonymous report by visiting the TUPD website and filing a Silent Witness report. This form can be found at <https://publicsafety.tulane.edu/submit-a-tip>. You can also file an online report using the university's online report form: [Report a Concern or Incident | SRSS \(tulane.edu\)](#) where you can report on the details of the incident without revealing your identity. TUPD does not attempt to trace the origin of the person who submits the Silent Witness form unless such action is deemed necessary for public safety. The purpose of an anonymous report is to comply with your wish to keep the matter confidential while taking steps to ensure the future safety of yourself and others. With such information, the university can keep an accurate record of the number of incidents involving students, employees and visitors; determine where there is a pattern of crime regarding a particular location, method or assailant; and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution and may be considered for Timely Warning and Emergency Notifications.

Anyone may call the TUPD at 504-865-5911 (55911 from a campus phone) for the uptown campus and 504-988-5555 (85555 from a campus phone) for the downtown campus to report concerning information. Callers may remain anonymous.

Reporting to University Police

We encourage all members of the Tulane community to report all crimes and other emergencies to TUPD, NOPD or the St. Tammany Parish Sheriff's Office as appropriate, in a timely and accurate manner. TUPD has a dispatch center that is available by phone at 504-865-5911 (or simply 55911 from a campus phone) uptown and 504-988-5555 (or simply 85555 from a campus phone) downtown, or in person 24 hours a day at the office located in the Collins C. Diboll Complex, the uptown station located at 1036 Broadway St., or the downtown station located at 1201 Tulane Ave. Though there are many resources available, TUPD should be notified of any crime, whether or not an investigation continues, to ensure Tulane can assess any and all security concerns and inform the community if there is a significant threat to the university community.

Emergency Phones

There are 82 blue light emergency phones on the university's uptown campus and three on the downtown campus. These phones will dial directly to the TUPD when activated. Keep this network of lights in sight as you walk across campus. All you need to do is pick up the phone handset, push the red button, or dial 55911 on some phones, and you will be immediately connected to the TUPD Dispatch Center. Construction has forced the relocation of some of these phones. Some phones are currently being moved to locations that are more accessible. Many phones are also being upgraded to include mass notification capability.

Reporting to Other Campus Security Authorities

While Tulane University prefers that community members promptly report all crimes and other emergencies directly to TUPD at 504-865-5911 (or simply 55911 from a campus phone) uptown and 504-988-5555 (or simply 85555 from a campus phone) downtown or 911, we also recognize that some may prefer to report to other individuals or campus offices. The Clery Act recognizes certain university officials and offices as "Campus Security Authorities." Campus Security Authorities, or CSAs, have a duty to report criminal incidents, as defined by the Clery Act, to the crime collection body of Tulane. CSAs include a wide range of individuals with responsibility for campus security or student and campus activities. The definition of "Campus Security Authority" includes but is not limited to: "an official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings."

It is the university's institutional policy that all faculty, staff and employees are designated as Campus Security Authorities and are required to report all Clery Act crimes occurring within the institution's Clery geography.

OFFICIAL	CAMPUS ADDRESS	PHONE NUMBER
Director of Clery Compliance	6823 St. Charles Ave., Ste. 113 Diboll Complex Bldg. #103 New Orleans, LA 70118	504-988-9898
Title IX Coordinator Deputy Title IX Coordinator	6801 Freret St. Joseph Merrick Jones Hall 308 New Orleans, LA 70118	504-865-5611
Assistant Vice-President of Student Affairs Student Resources & Support Services, Dean of Students (Division of Student Affairs)	6823 St. Charles Ave., Lavin-Bernick Center G02 New Orleans, LA 70118	504-314-2160 After Hours: 504-920-9900
Associate Vice-President of Human Resources	1555 Poydras St., Suite 964 New Orleans, LA 70112	504-247-1758
Assistant Vice President, Human Resources	1555 Poydras St., Suite 964 New Orleans, LA 70112	504-862-8083

Pastoral and Professional Counselors

According to the Clery Act, pastoral and professional mental health counselors, when functioning in those capacities on a campus, are exempt from CSA designation and are not required to report disclosures made to them while providing privileged services (unless other federal or state law applies). A *professional counselor* is defined as person whose official responsibilities include providing mental health counseling to members of the institution's community and who is functioning within the scope of the counselor's license or certification. A *pastoral counselor* is defined as a person who is associated with a religious order or denomination, is recognized by that religious order or denomination as someone who provides confidential counseling and is functioning within the scope of that recognition as a pastoral counselor. As a matter of policy, the university encourages pastoral and professional counselors to notify those whom they are counseling of the voluntary, confidential and anonymous reporting options available to them. TUPD sends a written request each year to all faculty, staff and employees (including the Counseling Center office and the Student Health Center) to report crimes for inclusion in the annual disclosure of crime statistics when deemed appropriate.

ABOUT THE TULANE UNIVERSITY POLICE

Role, Authority and Training

TUPD includes full-time commissioned officers trained at state-certified police academies, who meet the requirements of the Louisiana Peace Officer Standards and Training Council (POST). TUPD is also responsible for enforcing Louisiana state laws and New Orleans city ordinances. TUPD reports to the Associate Vice President for Public Safety and Community Engagement. Officers patrol the uptown, downtown and primate center campuses 24 hours a day, 365 days a year, along with the perimeter of the uptown and downtown campuses. Tulane officers are commissioned police officers who are authorized to make arrests and exercise investigative powers by the State of Louisiana. University police officers carry firearms and several other defensive weapons. Many of our officers are recruited from state and local law enforcement agencies. Many have extensive experience in campus law enforcement. Civilian and administrative staff receive special training in security and safety issues to supplement the department.

TUPD officers are commissioned under the Louisiana State Law Revised Statute 17:1805 and have the same authority as municipal police officers in the State of Louisiana, being authorized to carry firearms and empowered to make arrests. All reported criminal incidents are investigated by the TUPD on university campuses; however, NOPD will be the primary investigating agency for sex crimes and homicides occurring in Orleans Parish. All crimes that occur on campus or university property shall be reported to TUPD.

Safety, Our Priority

The Tulane University community is a great place to live, study and work. However, this does not mean that the campus community is immune to all the other unfortunate circumstances that arise in other communities. With that in mind, Tulane has taken progressive measures to create and maintain a reasonably safe environment on campus. Though the university is progressive with its policies, programs and education, it is up to each one of us to live with a sense of awareness and use reasonable judgment when living, working or visiting on campus.

With over 13,500 students and approximately 5,000 faculty and staff members on sizable uptown and downtown campuses with numerous buildings, Tulane is, in many ways, a small city inside the larger city that is New Orleans.

The university has instituted several measures to keep the campus and the surrounding neighborhood safer. This includes hiring a local security agency that observes the community. These officers receive university-specific training. Unlike TUPD officers, security officers do not have the authority to make arrests. Throughout the year across the university's campuses, many programs and services from various and collaborating departments work to raise awareness of safety and security issues and best practices, and in doing so, help prevent many types of crime both on-campus and off. In essence, all security awareness programs also help prevent crime. The programs are constantly being augmented by new programs created by students and by university offices serving the student and employee populations. Some of these programs are listed in various sections of the ASR.

TUPD provides and participates in several different safety and security programs and initiatives for the campus community. Some of these programs include:

Student Interaction Programs – Officers participate in community engagement programs such as 'Coffee with a Cop' and partnership programming with the Undergraduate Student Government (held quarterly).

Student Safety Committee – Collaborates with TUPD, Allied Security, the Associate Dean of Medical Education, the Associate Dean of Student Affairs, the Director of the Office of Medical Education, downtown administrators and fellow students to actively improve campus safety across the downtown campus and surrounding area (held every other month).

National Night Out Against Crime – TUPD officers attend neighborhood and community gatherings with the New Orleans Police Department to promote community policing and networking between law enforcement agencies and neighbors (held annually).

Safety Escorts – An on-request officer safety escort for anyone on campus, from and to any campus location, provided by TUPD with a call to dispatch. Promoted through student and parent orientations online and printed materials (as requested).

Everbridge – A smartphone app that can be used as a virtual escort to and from the various Tulane campuses. A valid university email address is required to set up your profile (as requested).

TUPD Website – Police department website with Clery Act information and resources, crime prevention resources, crime reporting forms and instruction (including anonymous reports for sexual assault and other incidents of crime), Sex Offender Registry, Silent Witness reporting, Crime Alerts, Daily Crime Log and Previous Months Crime Logs, Crime and Fire Statistics, ASR, links to neighboring law enforcement agencies, RAD Registration, Alcohol, Drug and Tobacco Policies. Promoted through orientations (always available).

Parent Orientations – Representatives from various university departments present to parents of incoming students the safety, security and well-being resources available, including from TUPD (held annually).

Business School Students Orientations - Experts from TUPD, the Office of the Dean of Students, and other departments present to students in the Business School MFIN, MACCT, MMGMT, and MME programs on personal safety, property protection and crime prevention and reporting (held annually).

Law School Students Orientations – Experts from TUPD, the Office of the Dean of Students, and other departments present to students in the Law School 1 L's and LLM's programs on personal safety, property protection and crime prevention and reporting (held annually).

International Student Orientation – Experts from TUPD present to international students on personal safety, property protection and crime prevention and reporting (held annually).

TUPD Safety and Prevention Presentations – TUPD police officers conduct in-person presentations on preventing and reporting crime, including active shooter response, crime

prevention, bystander intervention and police services. Promoted by e-mail, regular meetings with student and employee groups and upon request (as requested).

Bait Bike Program – Bicycles are outfitted with GPS and placed on campus as bait bikes and tracked via the Emergency Communications Center if taken. Mandatory registration of all bikes on the Tulane campus is provided through the Parking Services Division of the Facilities Services Department. Promoted by print and online marketing, orientations (as needed).

Guns are not allowed on Tulane property. By law, no guns are permitted within 1,000 feet of campus, except in constitutionally and statutorily protected areas and/or in possession of commissioned law enforcement officers.

While this report covers crime on the Tulane campus and thus raises concerns about the overall safety of the Tulane students and community members, it's important to remember that statistically, college campuses nationwide are safer places to be than the world that surrounds them. Between Tulane's commissioned officers, on and off-campus patrol and targeted dispatch system, the university neighborhood is one of the most protected parts of the city.

Working Relationship with Local, State and Federal Law Enforcement Agencies

TUPD maintains a cooperative relationship with the Louisiana State Police (LSP), New Orleans Police Department (NOPD) and surrounding police agencies. This includes inter-operative radio capability and a joint police records computer system, training programs, special events coordination and investigation of serious incidents.

TUPD participates in a Cooperative Endeavor Agreement with the City of New Orleans which authorizes TUPD officers and supervisors to provide law enforcement services beyond traditional campus borders and to request mutual aid for incidents based upon a reasonable belief that such aid will enhance the safety of the public while increasing officer safety and efficiency. This agreement also allows for joint training and cooperation on other matters, such as pre-planned large-scale special events.

Tulane University and NOPD work closely together to keep campuses and surrounding neighborhoods safe. The officers of TUPD and NOPD communicate regularly on the scenes of incidents that occur in and around the campus area. TUPD investigators work closely with NOPD investigators when incidents arise that affect the university community and require joint investigative efforts and resources. TUPD and local law enforcement agencies may also work collaboratively in the investigation of crimes occurring on campus which extend beyond the resources of the TUPD.

Tulane officers patrol regularly in the uptown area bordered by Jefferson, South Claiborne, South Carrollton, Leake Ave., Broadway St. and St. Charles Avenues. On the downtown campus, TUPD Officers patrol the area bordered by Canal, Elks Place, Claiborne and Poydras. TUPD also works with LSP when incidents arise that require collaboration. TUPD is a member of the Louisiana State Analytical and Fusion Exchange where intelligence and information are shared with other local and state agencies.

A daily crime log is kept of all incidents reported to TUPD. The daily crime log is available for review at the uptown and downtown district police stations, as well as the Tulane National Primate Research Center. It is also available on the TUPD website at <https://publicsafety.tulane.edu/daily-crime-log>. Tulane monitors incidents at its off-campus sites and records those offenses. Tulane police report and provide NOPD with pertinent records in cases of serious on-campus crime. NOPD and LSP accept and process evidence for serious crimes.

Crimes Involving Student Organizations at Off-Campus Locations

Tulane University relies on its close working relationships with local law enforcement agencies to receive information about incidents involving Tulane students and recognized student organizations, on and off university campuses. In coordination with local law enforcement agencies, TUPD will actively investigate certain crimes occurring on or near university campuses. If TUPD learns of criminal activity involving students or student organizations, it will coordinate with the appropriate external law enforcement agency and forward information about the situation to the Office of Student Conduct, as appropriate.

The university requires all recognized student organizations to abide by federal, state and local laws, and university policies and procedures. The university may become involved in the off-campus conduct of recognized student organizations when such conduct is determined to affect university interest (as defined in the Tulane Code of Student Conduct, found in PDF form at <https://conduct.tulane.edu/code-conduct>).

The university has several officially recognized student organizations that have privately owned housing facilities outside the boundaries of the uptown campus. The properties of these recognized student organizations are considered “non-campus” geography under the Clery Act. However, the university does not have any student organizations officially recognized by the university as providing on-campus housing facilities. If a community member calls NOPD to respond to one of these locations, NOPD will typically notify TUPD to respond jointly or they will notify TUPD after they have responded. However, NOPD does this out of courtesy and is not required to notify or involve TUPD when they respond to a call involving private property.

TIMELY WARNING REPORTS

Tulane University will issue a timely warning when a Clery crime, occurring within Clery geography, poses a serious or ongoing threat to the campus community. Timely Warning Notifications will be distributed as soon as pertinent information is available, in a timely manner, that withholds the names of victims as confidential, with the goal of aiding in the prevention of similar crimes or occurrences. TUPD will disseminate these warnings through a variety of mechanisms, including but not limited to email, SMS messaging and other forms of media. Timely Warnings are posted via a listserv as soon as pertinent information is collected. All students, faculty and staff members are automatically enrolled in this listserv and receive timely warnings for all campuses via email. The intent of Timely Warning Notifications is to warn the campus regarding a criminal incident, providing individuals with an opportunity to take reasonable precautions to protect themselves. Timely Warning Notifications are generally written by the Director of Clery Compliance or the Tulane Police Command Staff and distributed to the campus community by the TUPD. Warnings are routinely reviewed and approved by the Chief of Police or their designee prior to distribution.

Timely Warning Notifications are sent to the university community to notify members of the community about specific Clery Act crimes (as described below) that have been reported to TUPD, a Campus Security Authority or local law enforcement and that have occurred on or within the university’s Clery geography (on-campus, non-campus or public property), where after review and assessment it is determined that the incident may pose a serious or continuing threat to members of the community.

It is the policy of Tulane to follow the requirements of the Jeanne Clery Campus Safety Act concerning timely warnings to the campus community about Clery crimes occurring within the university’s Clery Act geography. It is also the policy of the TUPD to evaluate the seriousness and ongoing threat of all crimes reported to the university for **additional safety notifications**.

Timely Warning Notifications are typically issued for the following Uniform Crime Reporting Program (UCR)/National Incident-Based Reporting System (NIBRS) crime classifications:

- Murder/Non-Negligent Manslaughter.
- Aggravated Assault (cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case-by-case basis to determine if the individual is believed to be an ongoing threat to the larger university community).
- Robbery involving force or violence (cases including pickpocketing and purse snatching will typically not result in the issuance of a Timely Warning Notice but will be assessed on a case-by-case basis).
- Sexual Assault (considered on a case-by-case basis depending on the facts of the case, when and where the incident occurred, when it was reported and the amount of information known by the Director of Clery Compliance or designee).
- Major incidents of Arson, Motor Vehicle Thefts and Other Clery crimes as determined necessary by the Chief of Police or their designee.

A. Timely Warning Notification is required when the following conditions exist:

1. A Clery Act crime has been reported to have occurred.
2. The crime is reported to have occurred on the university's Clery Act geography.
3. The crime was reported to a campus security authority, TUPD or another local police agency.
4. The crime is considered by the university to represent a serious and continuing threat to students and employees.

B. Safety Notices may be sent when a crime was reported to a campus security authority, Tulane Police or other local police agency and any of the following conditions exist:

1. A Clery Act crime has been reported to have occurred outside Tulane University's Clery Act geography, in a location used and frequented by the university population and is determined to present a serious or ongoing threat to the community.
2. A non-Clery Act crime has been reported to have occurred and is determined to present a serious or ongoing threat to the community.
3. A series of criminal incidents has occurred on or near Tulane University's Clery Act geography which the university believes the community should be made aware of.

The Tulane Police Command Staff issues timely warnings and/or safety notifications under the authority of the Chief of Police. TUPD Chief of Police, or their designee, reviews all reported crimes to determine if there is an ongoing threat to the community and the distribution of a Timely Warning is warranted. Safety notifications may be posted for other crime classifications, as deemed necessary. TUPD will coordinate Safety Notifications with the primary investigating agency.

If the conditions above are met, the Staff Duty Officer or their designee will complete a timely review of the incident reports. TUPD utilizes a Timely Warning Notification Decision Matrix to assist in evaluating the potential for a serious or ongoing threat to the community. Timely Warning and Safety Notifications should be issued promptly after TUPD is made aware of the serious or ongoing threat. The notification should be issued as soon as pertinent information is available.

TUPD Chief of Police or designee reviews all reported crimes to determine if there is an ongoing threat to the community and the distribution of a Timely Warning is warranted. Safety Notifications may be posted

for other crime classifications, as deemed necessary. The Tulane Police Command Staff issues Timely Warnings under the authority of the Chief Operating Officer. For incidents involving off-campus crimes, the university may issue a Crime Alert if the crime occurred in a location used and frequented by the university population.

Tulane's uptown campus partners, parents, neighbors and others outside the campus can be made aware by subscribing to the Timely Warning listserv, a special email list used by TUPD. To subscribe, visit this web page: [Crime Alerts | Tulane Public Safety](#).

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

Emergency Management at Tulane University

Tulane University's Office of Emergency Preparedness and Response (OEPR) is responsible for the Emergency Operations All Hazards Plan (EOAHP). This plan is designed to be an all-hazards disaster response and emergency management plan that complies with FEMA guidelines for Higher Education that includes planning, mitigation, response and recovery actions. The mission of OEPR is to provide the university with a solid yet flexible emergency preparedness and response structure, positioned to provide for the best possible safety and welfare of the faculty, staff and students through the preservation of life, health, property and environment.

The primary function of the Life Safety Department is to provide a safe and secure environment for students, faculty and staff. Life Safety Department provides comprehensive services in support of the university's operations, including performing required testing, inspecting and maintaining the fire/life fire safety systems in all buildings on our campuses. Life Safety Department specialists ensure the university's fire life safety systems comply with the National Fire Protection Association's (NFPA) codes and other industry standards. The life safety technicians ensure that all fire code violations are corrected promptly. They maintain all suppression systems throughout the university, which include fire pumps, fire extinguishers, chemical suppression hoods, halon or energy systems and sprinkler systems. Life Safety Department also oversees the work of any outside contractors that modify or repair university fire systems. In addition, the life safety technicians maintain all the university's fire extinguishers and fire detection systems to code. These include fire alarms, smoke detectors, pull stations, horns and strobes. In addition, the university fire marshal, and in some cases, conditions, require a Life Safety Department crew to be on hand at university-based special events and major sporting events.

A summary of the university's emergency response procedures is located at <https://emergencyprep.tulane.edu>.

Included on this web page is detailed information regarding the university's emergency notification policy, including how to enroll in the emergency notification system to ensure you receive emergency notices on university and cellular telephones.

General information about the emergency response and evacuation procedures for the university is publicized each year as part of the institution's Clery Act compliance efforts, and that information is available on the Emergency Preparedness and Response website. Detailed information about and updates to the university EOAHP are available at the Office of Emergency Preparedness and Response. University departments are responsible for developing continuity of operations plans for their staff and areas of responsibility coordinated by the Office of Enterprise Risk Management.

OEPR is responsible for updating and maintaining the university's emergency plans. The university All-Hazards Emergency Operations Plan (EOP) provides the core framework for preparedness, response and recovery efforts that manage threats and/or incidents that could negatively impact the university's populations, assets, programs, properties, reputation and/or viability.

The plan is designed as a guide for the activation, organization, and deployment of essential personnel and resources by OEPR to manage incidents quickly and efficiently. To do this, the EOP provides:

- Authorizations for plan activation and the conduct of immediate response actions.
- An organized management system for response and recovery operations. Authorization and frameworks for coordination and communication with stakeholders.
- A methodology for both gathering and evaluating information and developing strategic action plans for managing the incident from onset to resolution.
- A system for developing and issuing safety advisories to university populations.
- A system for coordinating operations internally and with external agencies/response partners.
- Defined roles and response procedures for staff with emergency response assignments.
- A methodology for the procurement and allocation of resources, tracking emergency costs, and assessing damage and losses.

Within the EOP are annexes that cover a range of hazards from acts of violence, including active shooter, to building and structural collapse to health hazards to severe weather, including hurricanes. Each annex identifies the response roles and responsibilities various university departments have pertaining to the hazards described within the annex. Departmental plans are updated each spring and submitted to OEPR during the summer.

General information about emergency plans and responses can be found at <https://emergencyprep.tulane.edu>. Additionally, the EOP is posted on an internal website for all faculty and staff to access. Additionally, a mailer is sent to all employees and all students each summer reminding them of how they will receive emergency alerts (called TUALerts) and of the importance of having a personal evacuation plan for hurricanes.

Hurricane Evacuation Policy

In October 2022, the long-standing evacuation policy was codified by the Tulane University policy committee. The policy states that all faculty, staff, and students are required to have a personal evacuation plan that can be implemented independently and without reliance on Tulane. You can find considerations for your personal evacuation plan at <https://emergencyprep.tulane.edu/considerations-your-personal-evacuation-plan>.

Drills, Exercises and Training

Annually, Tulane University conducts an emergency management exercise to test emergency procedures. The scenarios for these exercises change from year to year and include several departments from across the campus. The exercises may include tabletop drills, emergency operations center exercises or full-scale emergency response exercises. Tulane conducts after-action reviews of its emergency management exercises. The university also tests the emergency notification systems on campus.

In conjunction with at least one emergency management exercise each year, the university will notify the community of the exercise and remind the community of the publicly available university information

regarding emergency response procedures, as explained here:
<https://emergencyprep.tulane.edu/emergency-communications-system>.

Tulane police officers and supervisors have received training in incident command and responding to critical incidents on campus. When a serious incident occurs that causes an immediate threat to the campus, the first responders to the scene are usually TUPD, the New Orleans Police Department (NOPD) and the New Orleans Fire Department (NOFD) and/or New Orleans Emergency Medical Services or the appropriate agency from the relevant jurisdiction; they typically respond and work together to manage the incident. Depending on the nature of the incident, other university departments and other local or federal agencies could also be involved in responding to the incident.

The Offices of Environmental Health and Safety (EHS) and Life Safety coordinate evacuation drills each semester for all residential facilities on university campuses. Thus, the emergency response and evacuation procedures are tested at least twice each year for each residential facility. Students learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. TUPD does not tell residents in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus and other factors such as the location and nature of the threat. In both cases, TUPD and Housing and Residential Life staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of a fire or other emergency. At the university, evacuation drills are used to educate and train occupants on fire safety issues specific to their building. During the drill, occupants “practice” drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm. In addition to educating the occupants of each building about the evacuation procedures during the drills, the process also provides the university an opportunity to test the operation of fire alarm system components.

Evacuation drills are monitored by TUPD, Fire and Life Safety, and the Housing and Residence Life departments (the downtown campus is monitored by Fire and Life Safety, TUPD and Facilities Services) to evaluate egress and behavioral patterns. The Department of Life Safety documents the response to each drill and provides recommendations for process improvement when appropriate

Students receive information about evacuation and shelter-in-place procedures during their first-floor meetings and during other educational sessions that they can participate in throughout the year. The resident advisors are trained in these procedures as well and act as an ongoing resource for the students living in residential facilities.

EHS conducts numerous announced and unannounced drills and exercises each year and conducts follow-through activities designed for the assessment and evaluation of emergency plans and capabilities. The university will publish a summary of its emergency response and evacuation procedures in conjunction with at least one drill or exercise each calendar year.

Additionally, the university has plans in place for evacuating students from the uptown and downtown campuses in the event they are threatened by severe weather. These plans supplement but do not replace the individual evacuation plan that each student is required to develop. In the event of an emergency requiring evacuation from campus, students may elect to self-evacuate. Those students remaining on

campus as of official closure time will be transported to a shelter a safe distance from campus, housed during the emergency and returned to campus when the campuses are reopened. OEPR maintains agreements for transportation and housing of students in the event of an emergency. To assist students with their evacuation plans, Transportation Services operates a shuttle to Louis Armstrong International Airport from the uptown campus from the initial announcement of closure until the university is evacuated.

Evacuation plans for individual buildings in Tulane National Primate Research Center (TNPRC) and Elmwood are identical to the New Orleans plans. Since there are no resident students in the TNPRC or Elmwood locations, there are no plans to evacuate students from the area in the case of severe weather.

Emergency Communications Tests

Quarterly emergency alert tests are conducted by OEPR. The university community and neighbors are notified via email one week and three days prior to the test. Results of the quarterly emergency alert tests are not published for the public or university community to see.

Testing

The purpose of testing the various emergency alert notification systems at the university is to ensure operational readiness, user familiarity and constituent comfort with the systems.

Testing Frequency

The university's emergency alert notification system, including the outdoor warning sirens, shall be tested university-wide every quarter. When possible, alerts shall be tested in conjunction with the emergency alert notification system and outdoor warning sirens. Tests shall not be conducted on Fridays that fall during exam periods.

Test Messages

The emergency alert notification system test message subject shall start with, "TU ALERT TEST" and the message body shall start with, "This is a test of the TU Alert System."

The outdoor warning sirens test shall begin with the sirens and then follow with, "This is a test of the Tulane University emergency alert system. This is only a test."

ALERTUS shall display the same test message as the emergency alert system: "TU ALERT Test."

Testing shall NOT include text or references to actual emergency conditions.

If the emergency alert notification system is being utilized in an exercise to enhance a scenario, best practice guidelines shall be followed. The message subject should start with, "TU ALERT Test" and the message body should both start and end with the phrase, "This is a test." Distribution should be limited to those participating in the exercise.

Testing Protocol

Advance notification shall always be given prior to testing the university's emergency alert systems. The following timeline and procedures for approval and execution of a test shall be adhered to:

- No later than one week prior to the test:

- Notification from OEPR shall be provided in writing of the date and time of the test to the Senior VP and COO and Communications.
- Notification shall include which emergency alert notification systems will be tested.
- NOTE: only OEPR may initiate a request to test the outdoor warning sirens.
- No later than three days prior to the test:
 - Notification from Communications and Government & Community Relations shall be provided in writing to all university community members as well as university neighbors.
 - Notification of the test may be placed on the OEPR website and university emergency webpage.
- No later than four hours prior to the test:
 - OEPR shall contact TUPD Command Staff to remind them of the test.
- No later than 15 minutes prior to the test:
 - Designees from OEPR, IT, and TUPD shall be placed throughout campus to listen for the outdoor warning sirens (if they are being tested).
- Test time:
 - Immediately prior to activation, OEPR shall notify all TUPD officers and the ECC via police radio of the pending activation.
 - At the approved time, OEPR and IT (if present), shall execute the test via the approved method(s).

Following each test, OEPR personnel develop a comprehensive After-Action Report (AAR) documenting the test and the process. The following information is documented: number of successful message deliveries, number of unsuccessful message deliveries, number of successful voice message deliveries, number of voice message diversions (voicemail) and number of unsuccessful voice message deliveries. Additionally, TUPD staff monitor all exterior annunciator poles to ensure successful delivery and adequate volume. All noted annunciator pole deliveries and volume reports are recorded in the relevant AAR.

Shelter-in-place procedures—what it means to “shelter-in-place”

If an incident occurs and the buildings or areas around you become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors because leaving the area may expose you to that danger. Thus, to “shelter-in-place” means to make a shelter of the building that you are in, and with a few adjustments, this location can be made even safer and more comfortable until it is safe to go outside.

Basic “shelter-in-place” guidance

If an incident occurs and the building you are in is not damaged, stay inside and seek an interior room until you are told it is safe to come out. If your building is damaged, take your personal belongings (purse, wallet, Tulane ID card, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit, and use the stairs instead of the elevators). Once you have evacuated, seek shelter at the nearest university building quickly. If police or fire department personnel are on the scene, follow their directions.

How you will know to “shelter-in-place”

A shelter-in-place notification may come from several sources, including TUPD, OEPR, other university employees, the federal or local government, NOPD or other authorities utilizing the university’s emergency communications tools. The university utilizes a mass notification system with text message and email capabilities and has installed an emergency alert siren system on the uptown campus, which will be used to notify all persons on the campus when there is a need to take immediate shelter. Procedures will

be immediately put in place to address sheltering for severe weather and sheltering during a campus lockdown.

How to “shelter-in-place”

No matter where you are, the basic steps of shelter-in-place will generally remain the same. Should the need ever arise; follow these steps, unless instructed otherwise by local emergency personnel:

- If you are inside, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency.
- If you are outdoors, proceed into the closest building quickly or follow instructions from emergency personnel on the scene.
- Locate a room to shelter inside. It should be: > An interior room. > Above ground level; and > Without windows or with the least number of windows. If there is a large group of people inside a particular building, several rooms may be necessary.
- Shut and lock all windows and close exterior doors.
- Turn off air conditioners, heaters and fans.
- Close vents to ventilation systems as you are able (university staff will turn off ventilation as quickly as possible).
- Make a list of the people with you and ask someone (house staff, faculty or other staff) to call the list in to TUPD so they know where you are sheltering. If only students are present, one of the students should call in the list.
- Turn on a radio or TV and listen for further instructions.
- Make yourself comfortable.

Emergency Notification

Tulane University is committed to ensuring the campus community receives timely, accurate and useful information in the event of a significant emergency or dangerous situation on campus or in the local area that poses an immediate threat to the health and safety of campus community members. In the event of a serious incident that poses an immediate threat to members of the Tulane community, the university has various systems in place for communicating information quickly. Some or all of these methods of communication may be activated in the event of an immediate threat to the campus community. These methods of communication include network emails and emergency text messages that can be sent to a phone or PDA, or a voice recorded message that can be sent to a specific phone number (for more information about university employees and students receiving alerts, and also periodic updates for parents, visit Tulane’s Emergency Communication Systems website at <https://emergencyprep.tulane.edu/emergency-communications>). All students, faculty and staff are automatically enrolled in the university’s emergency notification system. If individuals do not have Internet access during an emergency, the university also provides emergency information on the Tulane AlertLine (504-862-8080 or toll-free, 877-862-8080), a phone service that allows individuals to receive the same emergency information found on the emergency website in the form of a voicemail message.

The university will post updates during a critical incident on the university’s emergency website at <https://tulane.edu/emergency>. Members of the larger community who are interested in receiving information about emergencies on campus should use the emergency website at <https://tulane.edu/emergency> and the AlertLine, 504-862-8080, for obtaining updates in the event of an emergency on campus. The university performs an annual test of the system. The following procedures outline the process the university uses when issuing emergency notifications.

Procedures Used to Notify the Campus Community

In the event of a situation that poses an immediate threat to members of the campus community, the university has various systems in place for communicating information quickly. Some or all of these methods of communication may be activated in the event of emergency notification to all or a segment of the campus community. These methods of communication include the university's email system, verbal announcements within a building and public address system on police cars and emergency text messages that can be sent to a phone or PDA, or a voice recorded message that can be sent to a specific phone number (for more information about university employees and students receiving alerts and periodic updates for parents, visit Tulane's Emergency Communication Systems website at tulane.edu/emergency). In the event that individuals do not have Internet access during an emergency, Tulane also provides emergency information on the Tulane AlertLine (504-862-8080 or toll-free, 877-862-8080), a phone service that allows individuals to receive the same emergency information found on the emergency website in the form of a voicemail message.

The university will post updates during a critical incident on the homepage. If the situation warrants, the university will establish a telephone call-in center to communicate with the university community during an emergency.

Confirming the Existence of a Significant Emergency or Dangerous Situation and Initiating the Emergency Notification System

TUPD and/or other campus first responders may become aware of a critical incident or other emergency that potentially affects the health and/or safety of the campus community. Generally, campus first responders become aware of these situations when they are reported to the Emergency Communications Center or upon discovery during patrol or other assignments. Members of the university community are notified on an annual basis that they are required to notify TUPD of any situation or incident on campus that involves a significant emergency or dangerous situation and that may involve an immediate or ongoing threat to the health and safety of students and/or employees on campus. TUPD has the responsibility of responding to and confirming emergency situations, and when appropriate summoning the necessary resources, to mitigate, investigate and document situations that may cause a significant emergency or dangerous situation. In addition, TUPD has a responsibility to respond to such incidents to determine through direct observation or reasonable belief if the situation does in fact pose a threat to the community. If such a threat exists, the university will promptly notify the campus community or the appropriate segments of the community that may be affected by the situation.

Once first responders confirm that there is, in fact, an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the campus community, first responders will notify supervisors in TUPD or other authorized university offices to issue an emergency notification. Emergency notifications are primarily distributed through the Everbridge network. All TUPD supervisors and emergency response personnel are able to initiate alerts through the Everbridge network. Additional channels such as Tulane AlertLine or email distribution are activated by TUPD Command or OEPR managers.

The university's authorized representatives will immediately initiate all or some portions of the university's emergency notification system. If, in the professional judgment of first responders, issuing a notification potentially compromises efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency, the university may elect to delay issuing emergency notifications. As soon as the condition that may compromise efforts is no longer present, the university will issue the emergency notification to the campus community.

Determining the Appropriate Segment or Segments of the Campus Community to Receive an Emergency Notification

University and/or local first responders on the scene of a critical incident or dangerous situation will assist those preparing the emergency notification with determining if an emergency notification will be issued globally or specifically to a segment of the university community. If the acting TUPD administrator determines that an emergency incident is narrowly focused to a specific campus or area, an emergency alert or notification may be issued to that specific community. The university may issue subsequent notifications to a wider group of community members. Subsequent notifications may be determined by TUPD command, General Counsel, Student Affairs or University Communications and Marketing. In addition to the emergency notification that may be issued via the university notification system, the university will also post applicable messages about the dangerous condition to ensure the rest of the campus is aware of the situation and the steps they should take to maintain personal and campus safety on the university emergency website at <https://tulane.edu/emergency>. Members of the larger community who are interested in receiving information about emergencies on campus should use the emergency website at <https://tulane.edu/emergency> and the AlertLine, 504-862-8080, for obtaining updates in the event of an emergency on campus. If the emergency affects a significant portion of the entire campus, university officials will distribute the notification to the entire campus community.

Determining the Contents of the Emergency Notification

The Office of Emergency Preparedness and Response (OEPR) and University Communications and Marketing (UCM) receive information from various offices and departments on campus. If TUPD confirms that there is an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the university community, OEPR and UCM will collaborate to determine the content of the message. OEPR will initiate the process using some or all of the systems described below to communicate the threat to the university community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

Upon confirming that an emergency or dangerous situation exists involving an immediate threat to the health or safety of students or staff on campus, an immediate notification will be disseminated to the campus community. OEPR and UCM 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 judgment of the first responders (including, but not limited to: TUPD, NOPD, and/or the New Orleans Fire and Emergency Medical Services), compromise the efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. Emergency notifications are issued through the [Everbridge application](#) and are done via text, email and cellular call. Additional notifications may be processed through the Alertus system which enables electronic messaging to university computers and other electronic devices.

The university has developed a wide range of template messages addressing several different emergencies. The individual authorizing the alert will select the template message most appropriate to the ongoing situation and modify it to address the specifics of the present incident. In those cases where there are no pre-determined template messages in the system, the individual authorizing the alert will develop a message to convey the appropriate information to the community. The goal is to ensure individuals are aware of the situation and that they know the steps to take to safeguard their personal and community safety.

During incidents in which the university's emergency alert notification system has been used, the university may continue to send updates via that system to faculty, staff and students. The updates shall reflect the same messaging that UCM sends via email and posts on the website and social media. Additionally, the university shall send the "all clear" via the emergency alert notification system, which may be followed up with additional messaging from UCM.

Procedures for Disseminating Emergency Information to the Larger Community

The university will provide information to the larger community (parents, alums, New Orleans community) through the university website and local media outlets and resources. When circumstances require, UCM will provide media releases and ensure the website is kept current.

Enrolling in the University's Emergency Notification System All students, faculty, and staff are automatically enrolled in the university's emergency notification system. We encourage members of the campus community to enroll in the university's alert system. For more information about university employees and students receiving alerts, and periodic updates for parents, visit Tulane's Emergency Communication Systems website at <https://emergencyprep.tulane.edu/emergency-communications>. We encourage university community members to regularly update their information at the same site.

SECURITY OF AND ACCESS TO UNIVERSITY FACILITIES

Academic and Administrative Buildings

During normal business hours, Tulane University's uptown campus is generally open and accessible to students, faculty, staff and visitors of the university.

The majority of academic and administrative buildings are open during normal business hours (typically Monday through Friday, from 8 a.m. to 5 p.m., except holidays) and are typically secured during the late evening hours, depending upon class schedules, special event scheduling and community usage.

The downtown campus is not open to the public and requires card access. Most facilities have individual hours, and the hours may vary at different times of the year. Access to some of these buildings is also controlled by card access after normal business hours, and all of these buildings have varied levels of access. After business hours, buildings are secured by TUPD staff according to preset schedules, and re-entry into these buildings has to be cleared through the TUPD or made by key or card access entry.

Academic and administrative buildings do not have a TUPD staff member assigned to them. However, TUPD officers patrol the academic and administrative buildings on a regular basis. For information about the access protocol for a specific building, see the building manager, a department head or contact TUPD. Access to individual classrooms and laboratories is limited to those enrolled in the courses meeting there. Likewise, access to most programs is limited to those enrolled in the program or otherwise authorized access.

Special Considerations for Residence Hall Access

We expect students to secure their individual residence hall rooms and report anything suspicious to the TUPD and to Housing and Residence Life staff. Many residence halls maintain a 24-hour exterior door-locking system; entrance into buildings is by key or card. Visitors are allowed into the residence halls only when escorted by a resident. Other halls, including those for first-year students, have desk assistants hired by Housing and Residence Life who are on duty during defined hours; residents of those halls must show identification.

On the uptown campus, all residence halls operate under a computerized Access Control and Security Monitoring System. Identification cards are coded so that only students who are residents in a particular hall are authorized electronic access entry to that hall; the system denies entry to all unauthorized persons. Security Officers are responsible for checking and securing doors when needed.

When a door is malfunctioning, personnel are summoned for immediate repair. Remember to lock your doors and windows. Most residence halls are equipped with locks and with crash bars to ensure a quick emergency exit.

Only residents and their invited guests are permitted in the living areas of the residence halls. It is the resident's responsibility to ensure that their guest(s) are aware of the university and residence hall policies. Guests are not provided with room keys or door access cards. All exterior doors are locked 24 hours a day. It is the responsibility of residents and staff members to challenge or report individuals who cannot be identified as residents or the guests of residents. When TUPD receives a report of an unescorted person in a residence hall, a police officer is dispatched to identify that person. TUPD has contracted security guards assigned to each residence hall between the hours of 6 p.m. and 6 a.m. TUPD officers supplement this coverage by providing roving patrols throughout each campus four hours a day and seven days a week. During low-occupancy periods such as holidays and scheduled breaks, students are consolidated into designated buildings and gain access via the university's electronic access control system.

Security Considerations for the Maintenance of Campus Facilities

Tulane University is committed to campus safety and security. At the university, locks and outdoor lighting are intended to promote safety and security. Sidewalks are designed to provide well-traveled, lit routes from parking areas to buildings and from building to building. Maps showing the best-lit and most traveled routes across campus are available by contacting TUPD.

Environmental Health & Safety, in conjunction with representatives from TUPD, conducts surveys of university property twice each year to evaluate campus lighting. At the university, there are over 2,700 walkway, parking lot and roadway lights that provide illumination on campus.

The university also conducts an annual Campus Night Safety Walk. This event consists of a walk-through campus with staff from Facilities Services, Student Affairs, Risk Management, OEPR, TUPD and Student Government to identify areas in need of improved lighting, landscaping and other modifications that could make campus travel safer. This event is sponsored by Student Affairs.

To help ensure the safety of the entire university community, outdoor lighting, door-locking systems and landscaping around residence halls and throughout campus are maintained by the university's Facilities Services Department. Facilities and landscaping are maintained in a manner that minimizes hazardous conditions. TUPD regularly patrols the uptown and downtown campuses and reports malfunctioning lights and other unsafe physical conditions to the Facilities Services Department for correction. We encourage community members to promptly report any security concerns, including concerns about locking mechanisms, lighting or landscaping. Reports can be made using the online report form at <https://tulane.edu/concerns>.

TULANE UNIVERSITY'S RESPONSE TO SEXUAL AND GENDER VIOLENCE

Policy Statement

Tulane University prohibits the crimes of domestic violence, dating violence, sexual assault and stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the college community. Toward that end, Tulane issues this statement of policy to inform the campus community of our programs to address domestic violence, dating violence, sexual assault and stalking as well as the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault or stalking, which will be followed regardless of whether the incident occurs on or off campus when it is reported to a university official.

The university does not discriminate on the basis of sex in its educational programs nor tolerate sexual violence, which is a type of sex discrimination. Other acts can also be forms of sex-based discrimination and are prohibited, whether gender-based or not, and include intimate partner violence and stalking. The university issues this statement of policy to inform the community of our comprehensive plan addressing sexual misconduct, educational programs and procedures that address sexual assault, intimate partner violence and stalking, regardless of whether the incident occurs on or off campus, and regardless of how these events are reported to a university official.

The university's "All In" website also provides additional and in-depth information: <https://allin.tulane.edu>.

Federal Clery Act Definitions of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Domestic Violence:

A felony or misdemeanor crime of violence committed by:

1. A current or former spouse or intimate partner of the victim;
2. A person with whom the victim shares a child in common;
3. A person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
4. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
5. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Definition of a **Crime of Violence**: According to Section 16 of Title 18 of the United States Code, the term "crime of violence" means:

- i. An offense that has an element of the use, attempted use or threatened use of physical force against the person or property of another; or,
- ii. Any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

- i. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.
- ii. For the purposes of this definition—
 - a. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - b. Dating violence does not include acts covered under the definition of domestic violence.
- iii. For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Sexual Assault: An offense that meets the definition of rape, fondling, incest or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."

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

Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.

Incest is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape is defined as sexual intercourse with a person who is under the statutory age of consent.

Stalking:

- 1. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
 - A) Fear for the person's safety or the safety of others; or,
 - B) Suffer substantial emotional distress.

For the purposes of this definition—

- A) Course of Conduct means two or more acts, including, but not limited to, acts which the stalker directly, indirectly or through third parties, by any action, method, device or means follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property.
- B) Reasonable Person means a reasonable person under similar circumstances and with similar identities to the victim.
- C) Substantial Emotional Distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

For the purposes of complying with the requirements of this section and section §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Jurisdictional Definitions of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The university is required to include in this ASR the definitions of the terms “dating violence,” “domestic violence,” “sexual assault,” “stalking” and “consent” under Louisiana law, each of which is discussed below. The following are titles and sections of Louisiana State Law which most clearly coincide with the federal definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking as published in the Clery Act. The list is not exclusive or comprehensive, as circumstances involved with other crimes may also meet the Clery Act definitions. In situations where the state law definitions vary from those of the Clery Act, the specific circumstances of the incident are taken into account and compared to the Clery Act definitions to determine if the incident should be carried as a statistic for reporting purposes in this document.

The complete legal definitions of Louisiana Statutes with all subparts are publicly available on the Louisiana State Legislature website at the following address: <https://legis.la.gov/legis/LawSearch.aspx>.

Domestic Violence

Louisiana Revised Statutes (La R.S.) Title 46, Sections 2131 – 2148 establish the *Louisiana Domestic Abuse Prevention Act* including definitions of behaviors considered “domestic violence.” Under La R.S. 46:2132, “domestic abuse” includes but is not limited to physical or sexual abuse and any offense against the person, physical or non-physical, as defined in the Criminal Code of Louisiana, except negligent injury and defamation, committed by one family member, household member or dating partner against another. “Domestic abuse” also includes abuse of adults as defined in La R.S. 15:1503 when committed by an adult child or adult grandchild.

- a. **Family members** mean spouses, former spouses, parents and children, stepparents, stepchildren, foster parents, foster children, other ascendants and other descendants. “Family member” also means the other parent or foster parent of any child or foster child of the offender.
- b. **Household members** mean any person presently or formerly living in the same residence with the defendant and who is involved or has been involved in a sexual or intimate relationship with the defendant, or any child presently or formerly living in the same residence with the defendant, or any child of the defendant regardless of where the child resides.
- c. **Dating partner** means any person who is involved or has been involved in a sexual or intimate relationship with the offender characterized by the expectation of affectionate involvement independent of financial considerations, regardless of whether the person presently lives or formerly lived in the same residence with the offender. “Dating partner” shall not include a casual relationship or ordinary association between persons in a business or social context. La R.S. 46:2151.

Additionally, there are several criminal code sections that detail specific behaviors considered “domestic violence,” including, but not limited to La R.S. 14:35.3 Domestic abuse battery, La R.S. 14:37.7 Domestic abuse aggravated assault and La R.S. 14:79 Violation of protective orders. Other crimes may involve an element of domestic violence and are included in reported statistics if the behavior meets the Clery standard.

Dating Violence

Louisiana Revised Statutes (La R.S.) Title 46, Section 2151 establishes the *Louisiana Protection from Dating Violence Act* which extends all benefits and protections available under the *Louisiana Domestic Abuse Prevention Act* to persons who meet the definition of “dating partner.”

Additionally, there are several criminal code sections that detail specific behaviors considered “dating violence,” including, but not limited to La R.S. 14:34.9 Battery of a dating partner, La R.S. 14:34.9.1 Aggravated assault upon a dating partner and La R.S. 14:79 Violation of protective orders. Other crimes may involve an element of dating violence and are included in reported statistics if the behavior meets the Clery standard.

Sexual Assault

Louisiana Revised Statutes (La R.S.) Title 46, Sections 2181 – 2188 establish the *Louisiana Protection for Victims of Sexual Assault Act* and provides for victims of sexual assault access to civil remedies including protective orders. Louisiana defines sexual assault as any nonconsensual sexual contact including but not limited to any act provided in La R.S. 15:541(24) or obscenity (La R.S. 14:106).

Louisiana Revised Statutes (La R.S.) Title 14, contains several sections which define various behaviors considered “sexual assault,” including, but not limited to:

Rape:

A. Rape is the act of anal, oral or vaginal sexual intercourse with a male or female person committed without the person's lawful consent (La R.S. 14:41);

B. Emission is not necessary, and any sexual penetration, when the rape involves vaginal or anal intercourse, whether the penetration is accomplished using the genitals of the offender or victim or using any instrumentality and however slight, is sufficient to complete the crime.

C. For purposes of this Subpart, "oral sexual intercourse" means the intentional engaging in any of the following acts with another person:

1. The touching of the anus or genitals of the victim by the offender using the mouth or tongue of the offender.
2. The touching of the anus or genitals of the offender by the victim using the mouth or tongue of the victim.

D. For purposes of this Subpart, "anal sexual intercourse" and "vaginal sexual intercourse" mean the intentional engaging in any of the following acts with another person:

1. The penetration of the victim's anus or vagina by the offender using the genitals of the offender.
2. The penetration of the offender's anus or vagina by the victim using the genitals of the victim.
3. The penetration of the victim's anus or vagina by the offender using any instrumentality, except that normal medical treatment or normal sanitary care shall not be construed as sexual intercourse under the provisions of this Section.
4. The penetration of the offender's anus or vagina by the victim using any instrumentality except that normal medical treatment or normal sanitary care shall not be construed as sexual intercourse under the provisions of this Section.

First Degree Rape: a rape committed upon a person **65** years of age or older or where the anal, oral or vaginal sexual intercourse is deemed to be without lawful consent of the victim because it is committed under any one or more of the following circumstances:

- (1) When the victim resists the act to the utmost, but whose resistance is overcome by force.
- (2) When the victim is prevented from resisting the act by threats of great and immediate bodily harm, accompanied by apparent power of execution.
- (3) When the victim is prevented from resisting the act because the offender is armed with a dangerous weapon.

- (4) When the victim is under the age of 13 years. Lack of knowledge of the victim's age shall not be a defense.
- (5) When two or more offenders participated in the act.
- (6) When the victim is prevented from resisting the act because the victim is a person with a disability.
- (7) When the offender commits the act when engaged in the perpetration or attempted perpetration of any violation of Subpart 3 of Subpart A of Part III of this Chapter, relative to burglary offenses. (La R.S. 14:42);

Second Degree Rape: rape committed when the anal, oral or vaginal sexual intercourse is deemed to be without the lawful consent of the victim because it is committed under any one or more of the following circumstances:

- (1) When the victim is prevented from resisting the act by force or threats of physical violence under circumstances where the victim reasonably believes that such resistance would not prevent the rape.
- (2) When the victim is incapable of resisting or of understanding the nature of the act by reason of stupor or abnormal condition of the mind produced by a narcotic or anesthetic agent or other controlled dangerous substance administered by the offender and without the knowledge of the victim. (La R.S. 14:42.1);

Third Degree Rape: a rape committed when the anal, oral or vaginal sexual intercourse is deemed to be without the lawful consent of a victim because it is committed under any one or more of the following circumstances:

- (1) When the victim is incapable of resisting or of understanding the nature of the act by reason of a stupor or abnormal condition of mind produced by an intoxicating agent or any cause and the offender knew or should have known of the victim's incapacity.
- (2) When the victim, through unsoundness of mind, is temporarily or permanently incapable of understanding the nature of the act and the offender knew or should have known of the victim's incapacity.
- (3) When the victim submits under the belief that the person committing the act is someone known to the victim, other than the offender, and such belief is intentionally induced by any artifice, pretense, or concealment practiced by the offender.
- (4) When the offender acts without the consent of the victim. (La R.S. 14:43);

Sexual Battery: the intentional touching of the anus or genitals of the victim by the offender using any instrumentality or any part of the body of the offender, directly or through clothing, or the touching of the anus or genitals of the offender by the victim using any instrumentality or any part of the body of the victim, directly or through clothing, when any of the following occur:

- (1) The offender acts without the consent of the victim.
- (2) The victim has not yet attained 15 years of age and is at least three years younger than the offender.
- (3) The offender is 17 years of age or older and any of the following exist:
 - (a) The act is without consent of the victim, and the victim is prevented from resisting the act because either of the following conditions exist:
 - (i) The victim has paraplegia, quadriplegia, or is otherwise physically incapable of preventing the act due to a physical disability.

- (ii) The victim is incapable, through unsoundness of mind, of understanding the nature of the act, and the offender knew or should have known of the victim's incapacity. (La R.S. 14:43.1);

Misdemeanor Sexual Battery is the intentional touching of the breasts or buttocks of the victim by the offender using any instrumentality or any part of the body of the offender, directly or through clothing, or the intentional touching of the breasts or buttocks of the offender by the victim using any instrumentality or any part of the body of the victim, directly or through clothing, when the offender acts without the consent of the victim. (La R.S. 14:43.1.1);

Second Degree Sexual Battery is the intentional engaging in any of the following acts with another person when the offender intentionally inflicts serious bodily injury on the victim:

- (1) The touching of the anus or genitals of the victim by the offender using any instrumentality or any part of the body of the offender, directly or through clothing.
- (2) The touching of the anus or genitals of the offender by the victim using any instrumentality or any part of the body of the victim, directly or through clothing (La R.S. 14:43.2);

Oral Sexual Battery is the intentional touching of the anus or genitals of the victim by the offender using the mouth or tongue of the offender, or the touching of the anus or genitals of the offender by the victim using the mouth or tongue of the victim, when any of the following occur:

- (1) The victim is under the age of 15 years and is at least three years younger than the offender.
- (2) The offender is 17 years of age or older and any of the following exist:
 - a. The act is without the consent of the victim, and the victim is prevented from resisting the act because either of the following conditions exist:
 - i. The victim has paraplegia, quadriplegia, or is otherwise physically incapable of preventing the act due to a physical disability.
 - ii. The victim is incapable, through unsoundness of mind, of understanding the nature of the act, and the offender knew or should have known of the victim's incapacity.
 - b. The act is without the consent of the victim, and the victim is 65 years of age or older. (La R.S. 14:43.3);

Felony Carnal Knowledge of a Juvenile is committed when:

- (1) A person who is 17 years of age or older has sexual intercourse, with consent, with a person who is 13 years of age or older but less than 17 years of age, when the victim is not the spouse of the offender and when the difference between the age of the victim and the age of the offender is four years or greater; or
- (2) A person commits a second or subsequent offense of misdemeanor carnal knowledge of a juvenile, or a person who has been convicted one or more times of violating one or more crimes for which the offender is required to register as a sex offender under R.S. 15:542 commits a first offense of misdemeanor carnal knowledge of a juvenile. (La R.S. 14:80);

Misdemeanor Carnal Knowledge of a Juvenile is committed when a person who is 17 years of age or older has sexual intercourse, with consent, with a person who is 13 years of age or older but less than 17 years of age, when the victim is not the spouse of the offender, and when the difference between the age of the victim and age of the offender is greater than two years, but less than four years. (La R.S. 14:80.1);

Indecent Behavior with Juveniles is the commission of any of the following acts with the intention of arousing or gratifying the sexual desires of either person:

- (1) Any lewd or lascivious act upon the person or in the presence of any child under the age of 17, where there is an age difference of greater than two years between the two persons. Lack of knowledge of the child's age shall not be a defense; or
- (2) The transmission, delivery or utterance of any textual, visual, written or oral communication depicting lewd or lascivious conduct, text, words or images to any person reasonably believed to be under the age of 17 and reasonably believed to be at least two years younger than the offender. It shall not be a defense that the person who actually receives the transmission is not under the age of 17. (La R.S. 14:81);

Molestation of a Juvenile or a Person with a Physical or Mental Disability:

- (1) **Molestation of a juvenile** is the commission by anyone over the age of 17 of any lewd or lascivious act upon the person or in the presence of any child under the age of 17, where there is an age difference of greater than two years between the two persons, with the intention of arousing or gratifying the sexual desires of either person, by the use of force, violence, duress, menace, psychological intimidation, threat of great bodily harm, or by the use of influence by virtue of a position of control or supervision over the juvenile. Lack of knowledge of the juvenile's age shall not be a defense.
- (2) **Molestation of a person with a physical or mental disability** is the commission by anyone over the age of 17 of any lewd or lascivious act upon the victim or in the presence of any victim with the intention of arousing or gratifying the sexual desires of either person, by the use of force, violence, duress, menace, psychological intimidation, threat of great bodily harm, or by the use of influence by virtue of a position of control or supervision over the victim, when any of the following conditions exist:
 - (a) The victim has paraplegia, quadriplegia, or is otherwise physically incapable of preventing the act due to a physical disability.
 - (b) The victim is incapable, through unsoundness of mind, of understanding the nature of the act, and the offender knew or should have known of the victim's incapacity.
 - (c) The victim is 65 years of age or older. (La R.S. 14:81.2);

Prohibited Sexual Conduct Between Educator and Student is committed when any of the following occur:

- (1) An educator has sexual intercourse with a person who is 17 years of age or older, but less than 21 years of age, where there is an age difference of greater than four years between the two persons, when the victim is not the spouse of the offender and is a student at the school where the educator is assigned, employed or working at the time of the offense.
- (2) An educator commits any lewd or lascivious act upon a student or in the virtual or physical presence of a student who is 17 years of age or older, but less than 21 years of age, where there is an age difference of greater than four years between the two persons, with the intention of gratifying the sexual desires of either person, when the victim is a student at the school in which the educator is assigned, employed or working at the time of the offense.
- (3) An educator intentionally engages in the touching of the anus or genitals of a student 17 years of age or older, but less than 21 years of age, where there is an age difference of greater than four years between the two persons, using any instrumentality or any part of the body of the educator, or the touching of the anus or genitals of the educator by a person 17 years of age or older, but less than 21 years of age, where there is an age difference of greater than four years

between the two persons, when the victim is a student at the school in which the educator is assigned, employed or working at the time of the offense using any instrumentality or any part of the body of the student. (La R.S. 14:81.4);

Crime Against Nature is either of the following:

- (1) The unnatural carnal copulation by a human being with another of the same sex or opposite sex, except that anal sexual intercourse between two human beings shall not be deemed as a crime against nature when done under any of the circumstances described in R.S. 14:41, 42, 42.1, or 43. Emission is not necessary; and, when committed by a human being with another, the use of the genital organ of one of the offenders of whatever sex is sufficient to constitute the crime.
- (2) The marriage to, or sexual intercourse with, any ascendant or descendant, brother or sister, uncle or niece, aunt or nephew, with knowledge of their relationship. The relationship must be by consanguinity, but it is immaterial whether the parties to the act are related to one another by the whole or half blood. The provisions of this Paragraph shall not apply where one person, not a resident of this state at the time of the celebration of his marriage, contracted a marriage lawful at the place of celebration and thereafter removed to this state. (La R.S. 14:89);

Aggravated Crime Against Nature is either of the following:

- (1) An act as defined by R.S. 14:89(A)(1) committed under any one or more of the following circumstances:
 - (a) When the victim resists the act to the utmost, but such resistance is overcome by force.
 - (b) When the victim is prevented from resisting the act by threats of great and immediate bodily harm accompanied by apparent power of execution.
 - (c) When the victim is prevented from resisting the act because the offender is armed with a dangerous weapon.
 - (d) When as a result of an intellectual or mental disability, or any unsoundness of mind, either temporary or permanent, the victim is incapable of giving consent and the offender knew or should have known of such incapacity.
 - (e) When the victim is incapable of resisting or of understanding the nature of the act, by reason of stupor or abnormal condition of mind produced by a narcotic or anesthetic agent, administered by or with the privity of the offender; or when he has such incapacity, by reason of a stupor or abnormal condition of mind from any cause, and the offender knew or should have known of such incapacity.
 - (f) When the victim is under the age of 17 years and the offender is at least three years older than the victim.
- (2) (a) The engaging in any prohibited act enumerated in Subparagraph (b) of this Paragraph with a person who is under 18 years of age and who is known to the offender to be related to the offender as any of the following biological, step or adoptive relatives: child, grandchild of any degree, brother, sister, half-brother, half-sister, uncle, aunt, nephew or niece.
- (b) The following are prohibited acts under this Paragraph:
 - (i) Sexual intercourse, sexual battery, second degree sexual battery, carnal knowledge of a juvenile, indecent behavior with juveniles, pornography involving juveniles, molestation of a juvenile or a person with a physical or mental disability, crime against nature, cruelty to juveniles, parent enticing a child into prostitution or any other involvement of a child in sexual activity constituting a crime under the laws of this state.

- (ii) Any lewd fondling or touching of the person of either the child or the offender, done or submitted to with the intent to arouse or to satisfy the sexual desires of either the child, the offender, or both. (La R.S. 14:89.1);

Sexual Battery of Persons with Infirmities: the intentional engaging in any of the sexual acts listed in Subsection B of this Section with another person when:

- (1) The offender compels the victim, who is physically incapable of preventing the act because of advanced age or physical infirmity, to submit by placing the victim in fear of receiving bodily harm.
- (2) The victim is incapable of resisting or of understanding the nature of the act by reason of stupor or abnormal condition of the mind produced by an intoxicating, narcotic or anesthetic agent administered by or with the privity of the offender.
- (3) The victim has such incapacity, by reason of a stupor or abnormal condition of mind from any cause, and the offender knew or should have known of the victim's incapacity.
- (4) The victim is incapable, through unsoundness of mind, whether temporary or permanent, of understanding the nature of the act, and the offender knew or should have known of the victim's incapacity. (La R.S. 14:93.5).

Other crimes may involve an element of sexual assault and are included in reported statistics if the behavior meets the Clery standard.

Stalking

Louisiana Revised Statutes (La R.S.) Title 46, Section 2171 – 2174 establishes the Louisiana *Protection from Stalking Act* which extends all benefits and protections available under the Louisiana *Domestic Abuse Prevention Act* to victims of stalking.

Stalking is the intentional and repeated following or harassing of another person that would cause a reasonable person to feel alarmed or to suffer emotional distress. Stalking shall include but not be limited to the intentional and repeated uninvited presence of the perpetrator at another person's home, workplace, school, or any place which would cause a reasonable person to be alarmed, or to suffer emotional distress as a result of verbal, written or behaviorally implied threats of death, bodily injury, sexual assault, kidnapping or any other statutory criminal act to himself or any member of his family or any person with whom he is acquainted. (La R.S. 14:40.2).

Cyberstalking is the action of any person to accomplish any of the following:

- (1) Use in electronic mail or electronic communication of any words or language threatening to inflict bodily harm to any person or to such person's child, sibling, spouse or dependent, or physical injury to the property of any person, or for the purpose of extorting money or other things of value from any person.
- (2) Electronically mail or electronically communicate to another repeatedly, whether or not conversation ensues, for the purpose of threatening, terrifying or harassing any person.
- (3) Electronically mail or electronically communicate to another and to knowingly make any false statement concerning death, injury, illness, disfigurement, indecent conduct or criminal conduct of the person electronically mailed or of any member of the person's family or household with the intent to threaten, terrify or harass.
- (4) Knowingly permit an electronic communication device under the person's control to be used for the taking of an action in Paragraph (1), (2) or (3) of this Subsection.

Louisiana Revised Statutes (La R.S.) Title 46, Section 2171 – 2174 establishes the Louisiana *Protection from Stalking Act* which extends all benefits and protections available under the Louisiana Domestic Abuse Prevention Act to victims of stalking.

Other crimes may involve an element of stalking and are included in reported statistics if the behavior meets the Clery standard.

Consent: In reference to sexual activity, consent is not defined by statute in Louisiana.

Sexual Misconduct & Title IX Violations

Sexual misconduct encompasses a range of behaviors that violate Tulane University's commitment to maintaining a safe, respectful, and nondiscriminatory learning and working environment. Title IX violations refer to conduct that constitutes sex-based discrimination, harassment or violence as defined by Tulane's Title IX Policy and federal law.

Prohibited behaviors include, but are not limited to:

- Sexual harassment, including quid pro quo harassment and hostile environment harassment.
- Sexual assault, including non-consensual sexual contact or penetration.
- Dating violence, domestic violence and stalking as defined by the Violence Against Women Act (VAWA).
- Retaliation against individuals who report, participate in or oppose sex-based discrimination or misconduct.
- Other forms of sex-based misconduct that interfere with an individual's access to education or employment at Tulane.

Prohibited Sexual Misconduct

Prohibited Conduct Subject to Tulane's Code of Student Conduct

As stated in Part VI of the Code of Student Conduct, sexual misconduct is prohibited. Tulane defines the following as forms of sexual misconduct which are subject to the response and adjudication procedures that are explained in the Code:

1. Sexual Harassment

Sexual Harassment includes:

- a. Any unwelcome sexual advance, request for sexual favors or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical, electronic or otherwise (Sexual Harassment); or, any act of intimidation or hostility, whether verbal or non-verbal, graphic, physical or otherwise based on sex or gender, sexual orientation, gender identity or gender expression, even if the acts do not involve conduct of a sexual nature (gender-based harassment), when one or more of the following conditions are present:
 - i. Submission to or rejection of such conduct is either an explicit or implicit term or condition of, or is used as the basis for decisions affecting, an individual's employment or advancement in employment, evaluation of academic work or advancement in an academic program or basis for participation in any aspect of a Tulane program or activity (quid pro quo); or
 - ii. The conduct is sufficiently severe, pervasive or persistent that it has the purpose or effect of unreasonably interfering with, limiting or depriving an individual from

participating in or benefiting from Tulane's learning, working or residential programs under both an objective and subjective standard (hostile environment).

In evaluating whether a hostile environment exists, Tulane will evaluate the totality of known circumstances, including, but not limited to:

- the frequency, nature and severity of the conduct;
- whether the conduct was physically threatening;
- the effect of the conduct on the Complainant's mental or emotional state;
- whether the conduct was directed at more than one person;
- whether the conduct arose in the context of other discriminatory conduct;
- whether the conduct unreasonably interfered with the Complainant's educational or work performance and/or Tulane programs or activities;
- whether the conduct implicates academic freedom or protected speech; and,
- other relevant factors that may arise from consideration of the reported facts and circumstances.

2. Sexual Assault

Sexual Assault is having or attempting to have sexual contact with another individual without consent or where the individual cannot consent because of age or temporary or permanent mental incapacity.

a. Sexual Assault includes:

- i. Penetration, no matter how slight,
- ii. of the vagina or anus of a person,
- iii. with any body part or object, or
- iv. oral penetration
 1. of a sex organ of the Complainant, or
 2. by the Respondent's sex organ,
- v. without the consent of the Complainant,
- vi. including instances where the Complainant is incapable of giving consent because of their age or because of a temporary or permanent mental or physical incapacity.

b. Sexual Contact includes:

- i. The intentional touching of the clothed or unclothed genitals, buttocks, groin, breasts, or other body parts of the Complainant by the Respondent,
 1. without the consent of the Complainant,
 2. for the purpose of sexual degradation, sexual gratification or sexual humiliation
- ii. Or, the intentional touching by the Complainant of the Respondent's clothed or unclothed genitals, buttocks, groin, breasts or other body parts,
 1. without the consent of the Complainant,
 2. for the purpose of sexual degradation, sexual gratification or sexual humiliation.

c. Consent

i. Consent is defined as being:

1. informed (knowing);
2. voluntary (freely given); and
3. active (not passive), meaning that, through the demonstration of clear words or actions, a person has indicated permission to engage in mutually agreed-upon sexual activity.

ii. Consent cannot be obtained by Force. Force includes: the use of physical violence, threats, intimidation and/or coercion.

1. Physical violence means that a person is exerting control over another person through the use of physical force. Examples of physical violence include hitting, punching, slapping, kicking, restraining, choking and brandishing or using any weapon.
 2. Threats are words or actions that would compel a reasonable person to engage in unwanted sexual activity. Examples include threats to harm a person physically, to reveal private information to harm a person's reputation, or to cause a person academic or economic harm.
 3. Intimidation is an implied threat that menaces or causes reasonable fear in another person. A person's size, alone, does not constitute intimidation; however, a person's size may be used in a way that constitutes intimidation (e.g., blocking access to an exit).
 4. Coercion is the use of an unreasonable amount of pressure to gain sexual access. Coercion is more than an effort to persuade, entice or attract another person to have sex. When a person makes clear a decision not to participate in a particular form of Sexual Contact or Sexual Intercourse, a decision to stop, or a decision not to go beyond a certain sexual interaction, continued pressure can be coercive. In evaluating whether coercion was used, the University will consider:
 1. the frequency of the application of the pressure,
 2. the intensity of the pressure,
 3. the degree of isolation of the person being pressured, and
 4. the duration of the pressure.
- iii. Consent cannot be gained by taking advantage of the incapacitation of another, where the person initiating sexual activity knew or reasonably should have known that the other was incapacitated. Incapacitation means that a person lacks the ability to make informed, rational judgments about whether or not to engage in sexual activity. A person who is incapacitated is unable, temporarily or permanently, to give Consent because of mental or physical helplessness, sleep, unconsciousness or lack of awareness that sexual activity is taking place. A person may be incapacitated as a result of the consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition.
- iv. Being impaired by alcohol or other drugs is not a defense to not obtaining consent.

3. Dating Violence

- a. Dating Violence includes:
 - i. Violence
 - ii. committed by a Respondent,
 - iii. who is in or has been in a social relationship of a romantic or intimate nature with the Complainant
 1. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition—
 - a. Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse
 - b. Dating Violence does not include acts covered under the definition of Domestic Violence

4. Domestic Violence

- a. Domestic violence includes:
 - i. Violence,

- ii. committed by a Respondent who is a current or former spouse or intimate partner of the Complainant,
- iii. by a person with whom the Complainant shares a child in common, or
- iv. by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner, or
- v. by a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Louisiana, or
- vi. by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Louisiana.

5. Stalking

Stalking is engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress.

- a. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property.
- b. Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.
- c. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.

6. Sexual Exploitation

- a. Any person taking non-consensual or abusive sexual advantage of another, that does not constitute Sexual Harassment as defined above,
- b. for their own benefit or for the benefit of anyone other than the person being exploited.

Examples of Sexual Exploitation include, but are not limited to:

- i. Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts, without the consent of the person being observed)
- ii. Distributing (e.g., Airdropping, Snapchatting, displaying on a device for others to see) Authentic or Synthetic Non-Consensual Intimate Imagery
- iii. Knowingly making an unwelcome disclosure of (or threatening to disclose) an individual's sexual orientation, gender identity or gender expression
- iv. Taking pictures, video or audio recording of another person in a sexual act, or in any other sexually related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity; or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity; or disseminating sexual pictures without the photographed person's consent)
- v. Prostituting another person
- vi. Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity
- vii. Misappropriation of another person's identity on apps, websites or other venues designed for dating or sexual connections (e.g., spoofing)

- viii. Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio or an image that depicts the person's nudity or sexual activity
- ix. Knowingly soliciting a minor for sexual activity
- x. Engaging in sex trafficking
- xi. Knowingly creating, possessing or disseminating child sexual abuse images or recordings
- xii. Creating or disseminating synthetic media, including images, videos or audio representations of individuals doing or saying sexually related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes).

Some forms of sexual misconduct prohibited by Tulane's Code are also within the scope of Title IX Sexual Harassment, as defined in the 2020 regulations.

The Title IX regulations define Sexual Harassment as conduct on the basis of sex that must satisfy one or more of the following:

1. A Tulane employee conditions the provision of an aid, benefit or service of Tulane on an individual's participating in unwelcome sexual conduct; or
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to Tulane's education program or activity; or
3. As defined above in Section C(1), any incident(s) of Sexual Assault, Dating Violence, Domestic Violence and Stalking, that occurs within *Tulane's Education Program or Activity*.
 - a. The statutory definition of sexual assault referenced by the Title IX regulations also includes having or attempting to have sexual contact between persons who are related to each other within the degrees where marriage is prohibited by law.

Reported sexual misconduct is considered to have occurred within a Tulane Education Program or Activity if the answer to all of the following questions is yes:

1. Does Tulane have substantial control over the Respondent? And,
2. Does Tulane have substantial control over the context in which the conduct is reported to have occurred; or did the conduct occur in a building owned or controlled by a student organization that is officially recognized by Tulane? And,
3. Is the Complainant currently participating or attempting to participate in a Tulane Education Program or Activity?
4. Did the reported conduct occur in the United States?
5. Would the facts set forth by the report, if substantiated, constitute a violation of Sexual Harassment as defined by the Title IX regulations?

Student conduct that meets this definition must be resolved using the Title IX Grievance Procedures articulated in this Appendix. More information on the reporting process and how Tulane evaluates reports with this criteria to determine if it is Title IX Sexual Harassment or sexual misconduct subject to the Code can be found in Part I, Section G of this Appendix.

Retaliation

Retaliation is any adverse action taken by a student against another student because they have reported misconduct, participated in an investigation or disciplinary process, or opposed actions that violate University policies. Prohibited retaliation includes, but is not limited to:

- Threats, intimidation, or coercion, whether verbal, written, digital or physical, intended to deter or punish a student for reporting or participating in an investigation.
- Harassment or hostile treatment, including public humiliation, or targeted online attacks against a student who has filed a report or participated in a University process.
- Academic or organizational retaliation, such as attempting to remove a student from a student organization, study group or team, or pressuring others to interfere with their academic opportunities.
- Encouraging others to retaliate, such as spreading false rumors or inciting hostility against them.
- False counterclaims filed in bad faith to intimidate or discredit a student who has made a report.

What Retaliation Does Not Include:

- Differing opinions, personal disagreements or criticism, unless they escalate into intimidation, harassment, or threats.
- Consequences of one's own actions, including being held accountable for misconduct through an impartial university process.
- University-imposed sanctions resulting from a fair investigation into misconduct.
- Voluntary changes in social relationships, such as peers choosing to distance themselves from an individual without coercion or organized exclusion. Students sharing their accounts of events, experiences, or concerns related to matters covered by this Code.

Tulane University Definition for Employees (Faculty, Staff, and Affiliates)

Sexual Harassment Defined

A) *Sexual Harassment* includes two distinct but overlapping definitions:

1) The May 2020 amendments to the Title IX regulations (34 C.F.R. part 106) define Sexual Harassment as conduct on the basis of sex that must satisfy one or more of the following:

- a) A Tulane employee conditions the provision of an aid, benefit or service of Tulane on an individual's participating in unwelcome sexual conduct; or
- b) Unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to Tulane's education program or activity; or
- c) Sexual Assault, Dating Violence, Domestic Violence and Stalking, as defined in Section III, Parts B, C, D and E below.

Conduct that meets this definition must be resolved using the Title IX Grievance Procedures articulated in this Appendix in Part VIII below.

2) In addition, consistent with Title VII of the Civil Rights Act of 1964 and the recognition that Sexual Harassment may also occur in a wider variety of contexts, Tulane also defines Sexual Harassment to include any unwelcome sexual advance, request for sexual favors or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical, electronic or otherwise (Sexual Harassment); or, any act of intimidation or hostility, whether verbal or nonverbal, graphic, physical or otherwise based on sex or gender, sexual orientation, gender identity or gender expression, even if the acts do not involve conduct of a sexual nature (gender-based harassment); when one or more of the following conditions are present:

- a) Submission to or rejection of such conduct is either an explicit or implicit term or condition of, or is used as the basis for decisions affecting, an individual's employment

or advancement in employment, evaluation of academic work or advancement in an academic program, or basis for participation in any aspect of a Tulane program or activity (quid pro quo); or

b) The conduct is sufficiently severe, pervasive, or persistent that it has the purpose or effect of unreasonably interfering with, limiting or depriving an individual from participating in or benefiting from Tulane's learning, working, or residential programs under both an objective and subjective standard (hostile environment).

In evaluating whether a hostile environment exists, Tulane will evaluate the totality of known circumstances, including, but not limited to:

- i. the frequency, nature and severity of the conduct;
- ii. whether the conduct was physically threatening;
- iii. the effect of the conduct on the Complainant's mental or emotional state;
- iv. whether the conduct was directed at more than one person;
- v. whether the conduct arose in the context of other discriminatory conduct;
- vi. whether the conduct unreasonably interfered with the Complainant's educational or work performance and/or Tulane programs or activities;
- vii. either the conduct implicates academic freedom or protected speech; and,
- viii. other relevant factors that may arise from consideration of the reported facts and circumstances.

Conduct that does not meet the Title IX definition of Sexual Harassment but meets this second (Title VII) definition will be investigated and adjudicated according to the procedures articulated in Section X of this Equal Opportunity-Anti Discrimination Policy.

B) *Sexual Assault* is having or attempting to have sexual contact with another individual without consent or where the individual cannot consent because of age or temporary or permanent mental incapacity.

1) Sexual contact includes:

- a) sexual intercourse (anal, oral or vaginal), including penetration with a body part (e.g., penis, finger, hand or tongue) or an object, or requiring another to penetrate themselves with a body part or an object, however slight;
- b) sexual touching of the private body parts, including, but not limited to, contact with the breasts, buttocks, groin, genitals or other intimate part of an individual's body for the purpose of sexual gratification; and
- c) attempts to commit sexual assault.

2) Consent

a) Consent is defined as being:

1. informed (knowing);
2. voluntary (freely given); and
3. active (not passive), meaning that, through the demonstration of clear words or actions, a person has indicated permission to engage in mutually agreed-upon sexual activity.

b) Consent cannot be obtained by force. Force includes: the use of physical violence, threats, intimidation and/or coercion.

1. Physical violence means that a person is exerting control over another person through the use of physical force. Examples of physical violence include hitting, punching, slapping, kicking, restraining, choking and brandishing or using any weapon.
 2. Threats are words or actions that would compel a reasonable person to engage in unwanted sexual activity. Examples include threats to harm a person physically, to reveal private information to harm a person's reputation, or to cause a person academic or economic harm.
 3. Intimidation is an implied threat that menaces or causes reasonable fear in another person. A person's size, alone, does not constitute intimidation; however, a person's size may be used in a way that constitutes intimidation (e.g., blocking access to an exit).
 4. Coercion is the use of an unreasonable amount of pressure to gain sexual access. Coercion is more than an effort to persuade, entice or attract another person to have sex. When a person makes clear a decision not to participate in a particular form of Sexual Contact or Sexual Intercourse, a decision to stop, or a decision not to go beyond a certain sexual interaction, continued pressure can be coercive. In evaluating whether coercion was used, the University will consider:
 - a. the frequency of the application of the pressure,
 - b. the intensity of the pressure,
 - c. the degree of isolation of the person being pressured, and
 - d. the duration of the pressure.
- c) Consent cannot be gained by taking advantage of the incapacitation of another, where the person initiating sexual activity knew or reasonably should have known that the other was incapacitated. Incapacitation means that a person lacks the ability to make informed, rational judgments about whether or not to engage in sexual activity. A person who is incapacitated is unable, temporarily or permanently, to give Consent because of mental or physical helplessness, sleep, unconsciousness or lack of awareness that sexual activity is taking place. A person may be incapacitated as a result of the consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition.
- d) Being impaired by alcohol or other drugs is not a defense to not obtaining consent.

The statutory definition of sexual assault referenced by the Title IX regulations (34 C.F.R. part 106) also includes having or attempting to have sexual contact between persons who are related to each other within the degrees where marriage is prohibited by law.

C) *Dating Violence* is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the Complainant. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

- 1) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- 2) Dating violence does not include acts covered under the definition of domestic violence.

D) Domestic Violence includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction and includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic or technological abuse that may or may not constitute criminal behavior, by a person who—

- 1) is a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- 2) is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- 3) shares a child in common with the victim; or
- 4) commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.

E) Stalking is engaging in an intentional course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress.

- 1) Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property.
- 2) Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.
- 3) Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.

Reporting An Incident

If a student, employee or visitor has been the victim of an incident of sexual violence, including intimate partner violence, sexual assault or stalking, they may immediately report it to the TUPD at 504-865-5911. In the case of an emergency or ongoing threat, if possible, get to a safe location and report the incident to local police by calling 911. Victims may sometimes delay reporting an incident but still have the option of reporting to campus police and/or local law enforcement when they feel ready to report. Victims may also decline to make a report to campus police and/or local law enforcement.

TUPD officers will respond to campus incidents and locations within their patrol perimeter. Off-campus affiliate locations include fraternity and sorority houses, religious centers and administrative buildings. The reasons for reporting to the TUPD are:

- To take action that may prevent further victimization, including issuing a Timely Warning to warn the campus community of a continuing threat to safety;
- To apprehend the assailant; and
- To have the incident recorded for purposes of reporting statistics about incidents that occurred on campus. When the victim files a report with TUPD, they will be given the option of having a representative from Student Affairs and/or a friend present as a source of support and information. Louisiana state law also requires law enforcement to allow the presence of a victim advocate during an interview for certain sex crimes and other interpersonal violence. If the victim requires medical attention, the officers will summon an emergency medical service. The officers will also preserve evidence and conduct initial interviews. They will recommend a medical and rape examination to support the well-being of the victim and to further collect evidence that may be needed for a criminal case. The victim will have the choice to consent to all or only certain parts of the medical and rape examination and evidence collection. In cases of Sexual Assault, TUPD will coordinate with NOPD, who will have primary investigative authority.

The victim and their supporter will be safely escorted to the hospital for the examination. If there is a reasonable suspicion that date rape drugs may have been administered, the officers will encourage the victim to share this concern with the Sexual Assault Forensic Examiner (SAFE), so that testing is included in the examination. Police agencies have access to valuable forensic expertise and equipment to process on-the-scene evidence. If the victim chooses not to report the assault to NOPD, the evidence collected during the exam will be held in accordance with legislative guidelines.

Individuals may also report instances of intimate partner violence, sexual assault or stalking to Tulane's Title IX coordinator who is responsible for coordinating the institution's compliance with Title IX. The Title IX coordinator can be reached at 504-865-5611, at titleix@tulane.edu or in person at 308 Joseph Merrick Jones Hall, New Orleans, LA 70118.

Individuals may also report instances of intimate partner violence, sexual assault, or stalking to Tulane's Office of Student Resources and Support Services, which coordinates accommodations and resources for crime victims through its Office of Case Management and Victim Support Services. Through its Office of Student Conduct, Student Resources and Support Services investigates instances of intimate partner violence, sexual assault or stalking in which the perpetrator may be a Tulane student.

Incidents of intimate partner violence, sexual assault or stalking can be reported to the Office of Student Resources and Support Services by contacting the on-call staff member at 504-920-9900 or by filing an online report at <https://tulane.edu/concerns>.

Employees may also report to the Equal Opportunity & Resolution Management Department, at 504-862-8083 or at 1555 Poydras Street, Suite 964.

Tulane officials will assist victims in notifying law enforcement, including local police, if they elect to do so. Victims also maintain the ability to make a conscious decision to decline in notifying campus authorities and/or law enforcement if they do not wish to report. Students or employees who report an incident of sexual violence, whether the offense occurred on or off campus, shall receive a written explanation of their rights and options, as well as procedures a victim should follow for preserving evidence, reporting an incident to the university and to law enforcement, and limiting contact with the other party. This written explanation identifies existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance and other services available for victims, both within the institution and in the community; and describes options for available assistance in; and how to request changes to academic, living, transportation and working situations or protective measures. Tulane will make such accommodations or provide such protective measures if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement. In addition to providing this information in writing to victims, this information is also included in educational programs and materials provided to students and employees.

For additional Tulane University resources and reporting options information, visit <https://allin.tulane.edu>.

Procedures victims may choose to follow if an incident of sexual assault, intimate partner violence, or stalking occurs: It is important to preserve evidence to aid in the possibility of a successful criminal prosecution or obtaining a protective order. The victim of a sexual assault should, if possible, avoid washing, douching, using the toilet or changing clothing prior to a medical exam. Any clothing removed should be placed in a paper bag. Evidence of violence, such as bruising or other visible injuries, following

an incident of domestic or dating violence should be documented including the preservation of photographic evidence. Evidence of stalking including any communication, such as written notes, voicemail or other electronic communications, should be saved and not altered in any way.

Evidence may be collected by trained Sexual Assault Forensic Exam nurses (SAFE nurses) within 120 hours (5 days) of the assault. There are three locations in the New Orleans area where victims of sexual assault may seek a forensic exam: at the University Medical Center at 2001 Tulane Avenue, New Orleans, LA 70112, available 24/7; at Tulane-Lakeside Hospital at 4700 South I-10 Service Road W, Metairie, LA 70001, available 24/7; and at the Family Justice Center's HOPE Clinic at 701 Loyola Avenue, Suite 108, New Orleans, LA 70113, available Monday through Friday, 8 a.m. to 4 p.m. by calling 504-503-0878. TUPD can provide transportation and accompany a victim to the hospital for an examination and evidence collection. Student Resources & Support Services can also provide transportation and accompany a victim to the hospital for an examination and evidence collection.

On & Off Campus Resources

Both the New Orleans and Tulane University community offer important resources to the victims of sexual violence including medical treatment, counseling and advocacy. The Office of Case Management and Victim Support Services in the Division of Student Affairs for students, and Employee Relations in Human Resources are available to assist any student or employee free of charge and will help them consider their options and navigate through any resources or recourse they elect to pursue. TUPD and the Division of Student Affairs Office of Case Management and Victim Support Services provide to the Tulane community support services and referrals to victims of crime, on and off campus. The staff works with all victims of violence, sexual assault and harassment. Victim resource services are available upon request by contacting these offices.

Some of the victim services provided by these offices include referrals for medical, counseling, and legal assistance and emergency housing, as well as academic support. The Division of Student Affairs Office of Case Management and Victim Support Services is in suite G02 in the Lavin-Bernick Center and can be reached 24/7 by calling 504-920-9900.

A victim need not make a formal report to law enforcement or Tulane university to access the following resources. For additional university resources, visit <https://allin.tulane.edu>.

On-Campus Resources

- Office of Case Management and Victim Support Services in the Division of Student Affairs coordinates support and resources for student victims of crime and harassment, including sexual assault and harassment. Call 504-314-2160 during business hours and 504-920-9900 after hours.
- Reach TUPD 24/7 at 504-865-5381, 24/7.
- Tulane Counseling and Psychiatric Services (CAPS) at 504-314-2277. Individual and group counseling services for students.
- The Line, Confidential 24/7 telephone counseling available for students at 504-264-6074.
- Tulane Student Health Center at 504-865-5255.
- Sexual Aggression Peer Hotline and Education (SAPHE): 504-654-9543. 24/7 peer support for students. Only operates during the fall and spring semesters.
- Office of Student Conduct at 504-865-5516, for investigations of student respondents of sexual harassment and sexual violence.
- Hazing Hotline at 504-862-3111.

- Tulane's Equal Opportunity & Resolution Management Department at 504-862-8083, for investigations of faculty, staff and affiliate Respondents of sexual harassment and sexual violence.
- Title IX Coordinator for reporting sexual harassment and violence at 504-865-5611.

Support Available Off-Campus

These organizations assist with support and safe shelter for people experiencing sexual violence, intimate partner violence and stalking (for the public).

- Family Justice Center (504-592-4005, 504-866-9554 hotline).
- Metropolitan Centers for Community Advocacy (504-837-5400).
- National Sexual Assault Hotline (800-656-HOPE).
- Louisiana Domestic Violence Hotline (888-411-1333).
- National Domestic Violence Hotline (800-799-7233).
- STAR – <https://star.ngo/>

Other Support Available Off-Campus

The Employee Assistance Program, provided through Lucet, is available to all university employees. Call 1-800-624-5544 or visit their website at <https://eap.lucethealth.com> (Company Code: Tulane). This free and confidential service offers resources and referrals, counseling and support, online information and interactive tools to university employees and their families for health or personal issues. It is available 24 hours a day, year-round.

Supportive Measures and Other Accommodations and Protective Measures

Whether or not a student or employee reports to law enforcement and/or pursues any formal action, if they report an incident of sexual violence, Tulane University is committed to providing them as safe a learning or working environment as possible. Upon request, Tulane will make any reasonably available change to a victim's academic, living, transportation and/or working situation. Students may contact the Office of Case Management and Victim Support Services at 504-314-2160, located in suite G02 in the Lavin-Bernick Center, for assistance. Employees may contact the university's Office of Human Resources Equal Opportunity & Resolution Management Department at 504-865-4748 (HR4U), located at 1555 Poydras Street, Suite 964.

University staff will provide those reporting incidents of sexual violence information on how to obtain a protective order from a criminal and/or civil court and information on No Contact Orders (NCO) and how to request the issuance of an NCO from the university. It is important to remember that the university is not a party to civil or criminal protective orders and may have limited ability to facilitate enforcement of the terms of any such order. For NCOs, the university's Office of Student Conduct will monitor compliance and will work with the impacted parties to ensure that any such order is upheld. Bear in mind that, unlike judicially issued protective orders which are monitored and enforced by courts, an NCO is not a legal document, and alleged violations must be submitted to the Office of Student Conduct. The university is also committed to protecting anyone reporting sexual violence from further harm, and Student Resources and Support Services may issue a temporary no-contact order pending the outcome of any conduct proceeding. The Office of Student Conduct will adjudicate a violation of an active NCO. Students are informed as such in the actual NCO, "A violation of this Order could result in an immediate interim suspension and conduct charges against you." Use this link to access more information on reporting an incident as well as supportive measures and protective measures available to victims and survivors: <https://tulane.app.box.com/file/1895580814809?s=ycryn8fslabq0y1xbw9s87z8vnhp3eip>

Victim Confidentiality

Tulane University recognizes the sensitive nature of sexual violence and is committed to protecting the privacy of any individual who reports an incident of sexual violence. Reports made to Tulane officials will be kept private, and identifying information about the victim shall not be made public (except as otherwise required by the university's Child Abuse/Neglect reporting policy and procedures). Neither TUPD nor the Division of Student Affairs (including the Office of Student Resources and Support Services and its Office of Case Management and Victim Support Services and Office of Student Conduct) will release a Complainant's name to the public or the press. The university will disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased because of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this policy. The Office of Student Conduct may be required to disclose the identity of the reporting person/victim if known if the case proceeds to formal adjudication. Victims are notified in advance when this happens.

For more information about the student conduct/adjudication process or to obtain a copy of the Code of Student Conduct, contact the Office of Student Conduct at 504-865-5516 or visit <https://conduct.tulane.edu>.

The university will not release names in the issuance of "Timely Warnings" or "Emergency Notifications," nor in the "Daily Crime Log," each of which are required by the Clery Act. Any accommodation or protective measure will be confidential unless it interferes with the measure's implementation, nor will the university release any personally identifying information in any public record keeping.

Confidential resources for sexual assault within the university are the Counseling and Psychiatric Services (CAPS), the Student Health Center, the Sexual Aggression Peer Hotline and Education (SAPHE) phone line and The Line (24/7 telephone counseling). Conversations with these resources will not be shared with anyone else except in rare, extreme circumstances.

Private resources within the university for the reporting of sexual assault include TUPD, the Office of Student Resources and Support Services (including the Office of Student Conduct and the Office of Case Management and Victim Support Services), the EO, the Title IX office and Human Resources. Conversations with these groups are kept as confidential as possible, but information about incidents of sexual assault is shared with key staff members so that the university can offer resources and accommodations and take action if necessary for reasons of safety. In planning any response, the wishes of the victim are given full consideration by the university. Contacting one of these private resources may initiate an internal investigation by the university.

Sexual Assault Prevention/Education Programs

Tulane University is committed to increasing the awareness and prevention of sexual violence. All incoming students and new employees are provided with programming opportunities and strategies intended to prevent rape, sexual assault, intimate partner violence and stalking before it occurs through the changing of social norms and other approaches; that includes a clear statement that Tulane university prohibits such acts, their definitions, the definition of consent, options for bystander intervention, information about risk reduction and our policies and procedures for responding to these incidents. Risk reduction education includes strategies to reduce the likelihood that someone will engage in prohibited behavior, to increase the likelihood that bystanders will intervene to disrupt a potential moment of harm, to increase safety and empowerment for potential victims of crime and to increase the likelihood that all members of our

community will model consent, respect and care for others in all their interactions and behaviors. Ongoing prevention and awareness campaigns are also offered throughout the year, which include information on university policies and procedures and the rights of all parties in university disciplinary processes. These programs include, but are not limited to:

- One Wave Bystander Intervention Workshop for all university students.
- Alcohol Edu is a mandatory class for all new university students (first year and transfer students) that provides foundational education around alcohol and other substances, helping students build skills to keep themselves and others safe, correcting misperceptions about drinking and supporting a healthy campus community.
- Sexual Assault Prevention for Undergraduates is a Title IX and Clery Act training that engages undergraduate students in fostering healthy relationships and preparing them to recognize and respond to sexual assault and harassment when it occurs. This course defines Dating Violence, Domestic Violence, Sexual Assault, and consent under Louisiana law. This course is offered through Vector Solutions and is Clery/VAWA Compliant. This training is mandatory for all new university students (first year and transfer students).
- The Sexual Health for Students and Sexual Literacy for Students online curriculum for first-year and second-year students is designed to empower students around prosocial norms and healthy relationship skills. This training is mandatory for all new university students (first-year and transfer students).
- Live Well at Tulane Workshop for all incoming students about alcohol and other drug safety and related university policies.

All In: Understanding and Preventing Sexual Violence at the university facilitated by the SAPHEs for all incoming students, followed by SAPHE-facilitated small group discussion.

- Tulane University Peer Health Education (TUPHE) Workshops, as requested in residence halls, Fraternities and Sororities, TIDES Classes or Student Organizations.
- Sexual Aggression Peer Hotline and Education (SAPHE) workshops on practicing consent, understanding sexual violence, healthy relationships and supporting survivors of sexual violence.
- Compliance training for high-risk groups and presentations by Title IX Coordinator, Student Conduct, and/or the Equal Opportunity & Resolution Management Department.
- Online and/or in-person training for faculty and staff on the topic of sexual assault and sexual harassment.
- Online training for parents/families on the topic of sexual assault and sexual harassment.
- Shifting the Paradigm, an annual program that shares institutional data on sexual violence and promotes the education and prevention of such incidents on campus.
- Sexual Assault Awareness Month (SAAM) events to increase awareness of sexual violence prevention and response resources for the whole university community.
- Sexual Violence Prevention and Response Guide for Faculty to facilitate curriculum integration of prevention initiatives.
- Leading with Empathy: This workshop equips participants with key definitions related to sexual misconduct and gender discrimination, as well as evidence-based skills in trauma-informed advocacy, intervention tactics and conflict de-escalation within various environments.
- The Well for Health Promotion sexual violence prevention healthy workshop series, sex communication (consent-based) workshop series and sexual health workshop series available to any member of the campus community by request.

The university engages in wide-ranging educational programming to identify and prevent sexual assault, sexual violence, sexual harassment, intimate partner violence and stalking. Educational programming

opportunities consist of primary prevention and awareness programs and ongoing awareness and prevention campaigns for the campus community that:

1. Identifies sexual assault, sexual violence, sexual harassment, intimate partner violence and stalking as prohibited conduct;
2. Defines what behavior constitutes intimate partner violence, sexual assault and stalking under the Tulane Code of Student Conduct & Louisiana State Law;
3. Defines what behavior and actions constitute consent to sexual activity under the Tulane Code of Student Conduct and Louisiana State Law;
4. Provides safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of intimate partner violence, sexual assault or stalking against a person other than the bystander.

For comprehensive information on university educational programming around the prevention of sexual violence, including the university's prevention plan, please visit <https://allin.tulane.edu/prevention>.

One Wave-Bystander Intervention

One Wave is a comprehensive approach to the primary prevention of violence that capitalizes on the power of peer and cultural influence across all levels of the socio-ecological model. Informed by social change theory, the model targets all community members as potential bystanders and seeks to engage them through awareness, education and skills practice, in proactive behaviors that establish intolerance of violence as the norm, as well as reactive interventions in high-risk situations – resulting in the ultimate reduction of violence. Specifically, the program initially targets influential individuals from across community subgroups (faculty, staff, students). The goal is for these groups to engage in a basic education program that will equip them to integrate moments of prevention within existing relationships, spheres of influence and daily activities – both personal and professional. By doing so, new norms will be introduced and those within their sphere of influence will be significantly influenced to move from passive agreement that violence is wrong to active intervention. One Wave aims to mobilize a campus culture of safety and a community of engaged and proactive bystanders that do not tolerate any form of violence. One Wave will create a culture shift and reset the norm to: 1) violence will not be tolerated, and 2) everyone is expected to do their part. One Wave is an opportunity for everyone in our community to play their part to reduce harm on our campus by creating moments of safety and reducing moments of harm. No one has to do everything, but everyone has to do something.

Bystander Intervention strategies taught in One Wave workshops include the “three Ds”:

1. Direct: If you see a concerning behavior and are comfortable intervening, deal with it directly by interacting with one of the people involved.
2. Delegate: When you recognize a high-risk situation and you either feel uncomfortable saying something or you feel like someone else is better suited to handle it, delegating the responsibility is an option. This approach allows for a shared sense of responsibility among community members; you don't have to intervene alone. Sometimes you are not the right person to intervene but finding someone who can is important.
3. Distract: The focus of this approach is diversion. If you see a high-risk situation, thinking of a way to divert the attention of the people in the situation may be the most effective option to eliminate potential harm.

The One Wave workshops encourage students to practice these strategies in small group discussions, scenario activities and personal reflections.

University Disciplinary Procedures in Sexual and Gender Violence Incidents

On-Campus Investigation & Adjudication

Tulane University's response to sexual harassment, sexual assault, intimate partner violence and stalking incidents may involve several individuals and agencies (e.g., TUPD, the Title IX Coordinator, the EO, Tulane's Sexual Misconduct Response Team, the Office of Case Management & Victim Support Services, the Office of Student Conduct, etc.). In all cases, only those individuals with a need to know are involved in the university's response. For cases involving campus community members as Respondents, there is a timely, campus-based investigation that takes place. If the Respondent is a student, the Tulane Code of Student Conduct guides this process under the leadership of the Office of Student Conduct. If the Respondent is a faculty or staff member or university contractor, the investigation process is led by the EO applying the university's Equal Opportunity & Anti-Discrimination Policies.

However, some cases have conduct that also meets the definition of sexual harassment proscribed by the Department of Education in the Title IX federal regulations. In these circumstances, the case must be resolved using the Title IX federal regulation procedures that are in Appendix A of the Code of Student Conduct (for student Respondents) and Appendix B of the university's Equal Opportunity & Anti-Discrimination Policies.

Investigators in Title IX cases and any other case of sexual misconduct receive annual training on sexual misconduct and Title IX investigations and related issues such as conducting an investigation and hearing process that protects the safety of victims and promotes accountability. Investigators receive annual training through professional associations and the Student Conduct Institute. Trainings are cataloged through the Title IX Office. The university has a multi-disciplinary Sexual Misconduct Response Team, which is chaired by the Title IX Coordinator and includes representatives from TUPD, Case Management & Victim Support Services, the EO and the Office of Student Conduct.

Individuals who fill certain roles in the Title IX Grievance Procedure must receive annual training to ensure awareness of their compliance obligations and in order to best provide equitable treatment to complainants and respondents and be compliant with the Grievance Procedures required by Title IX. These individuals are the Title IX Coordinator, Deputy Coordinators, Investigators, Decision Makers (including appellate decision makers) and any person facilitating an Alternative Resolution Option within the Informal Process. Training subjects must include: the definition of Sexual Harassment as proscribed by the Title IX regulations; the scope of the university's education program or activity; how to conduct an Investigation and Grievance Process including Hearings, Appeals and informal resolution processes, as applicable.

Additionally, the Decision Maker(s) must receive training on any technology to be used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant. Investigators must also receive the appropriate training needed to create an investigative report that fairly summarizes relevant evidence.

The Title IX regulations (34 C.F.R. part 106) further require the university to make publicly available information on these trainings starting Aug. 14, 2020. A list of trainings attended by these individuals is

available at <https://tulane.app.box.com/v/titleixtraining>. This list includes all trainings attended post-Aug. 14, 2020. It also includes some trainings attended prior to Aug. 14, 2020, when the trainings were relevant to our obligations under the Title IX regulations (34 C.F.R. part 106). These trainings are both internal and external trainings. The list includes the materials used in the training, all of which are provided for public review. These materials will be kept for seven years.

Further, any individual designated by the university as a Title IX Coordinator, Investigator, Decision Maker, or any person facilitating an Alternative Resolution Option within the Informal Process, will not have a conflict of interest or bias for or against Complainants or Respondents generally or an individual Complainant or Respondent. They will also be required to receive training on how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest and bias. Any materials used to train Title IX Coordinator, Investigators, Decision-Makers and any person facilitating an Alternative Resolution Option within the Informal Process must not rely on sex stereotypes and must promote impartial investigations and adjudications of Formal Complaints of Sexual Harassment. Any training materials on these subjects will be publicly shared in the manner described above.

Title IX Federal Regulation Sexual Harassment (Students and Faculty/Staff)

Tulane University Sexual Misconduct Response and Title IX Coordinator or designee will be responsible for determining whether the reported conduct falls within Federal Regulation Sexual Harassment jurisdiction as defined by the Title IX regulations (34 C.F.R. part 106). If so, Tulane may move forward with a Formal Complaint process as described in the previous section. If not, the university may be required to dismiss any Formal Complaint. The university Sexual Misconduct Response and Title IX Coordinator will evaluate reasonably available information to make the following determinations:

1. Did the reported conduct occur within Tulane's Education Program or Activity? This must be answered in three parts:
 - a. Does the university have substantial control over the Respondent? And,
 - b. Does the university have substantial control over the context in which the conduct is reported to have occurred; or did the conduct occur in a building owned or controlled by a student organization that is officially recognized by the university? And,
 - c. Is the Complainant currently participating or attempting to participate in a Tulane Education Program or Activity?
2. Did the reported conduct occur in the United States?
3. Would the facts set forth by the report, if substantiated, constitute a violation of Sexual Harassment as defined by the Title IX regulations (34 C.F.R. part 106) and in Section III of this Appendix?

Based on the answers to these questions, the university's Sexual Misconduct Response and Title IX Coordinator will make a determination about scope and process. This is a threshold determination regarding scope and jurisdiction, which will determine appropriate next steps as follows:

- If the answer to these three questions is yes, and a Formal Complaint is filed, then the university will follow the formal Grievance Procedure required by the Title IX regulations (34 C.F.R. part 106) for Sexual Harassment matters. The Title IX Grievance Process includes, among other measures, a hearing with cross-examination by each party's advisors. The hearing will allow the participants to simultaneously see and hear each other but may be conducted remotely through videoconferencing technology.
- If the answer to any of these three questions is no, and a Formal Complaint has been filed, then the university must dismiss the allegations in the Formal Complaint related to Sexual Harassment as defined in the Title IX regulations in Section III of the Appendix, while also retaining the discretion to proceed according to processes outlined in other university policies (such as the

Code of Student Conduct, for investigation and adjudication of Sexual Misconduct other than Federal Regulation Sexual Harassment; or the Equal Opportunity Policies, for investigation and adjudication of sex discrimination that implicates Title VII).

The University Sexual Misconduct Response and Title IX Coordinator or designee will provide written notice of the determination as to scope and jurisdiction to the Complainant, refer that individual to the appropriate resources, including local law enforcement resources as applicable, and provide reasonably available Supportive Measures.

In the event a Respondent is charged with a violation of an applicable conduct code that is related to the report of Sexual Harassment, Student Conduct may also investigate and resolve the related conduct charge through the Title IX Grievance Procedure jointly (i.e., if there is an allegation of conduct that violates Title VI and Title IX) or separate the two and use their proscribed individual processes but without sharing information between the two systems. If the Respondent is charged with a violation of the Code that is unrelated to the alleged violation of Federal Regulation Sexual Harassment, Student Conduct shall coordinate its investigation and resolution as appropriate with any such investigation or resolution under the Code.

Appeals of the Dismissal of Formal Complaints

If a Complainant or Respondent would like to appeal the university Sexual Misconduct Response and Title IX Coordinator's decision to dismiss a Formal Complaint, they may submit an appeal to the Senior Vice President for Academic Affairs and Provost or their designee within one week of receiving the dismissal. The other party will be notified about the filing of the appeal and will then have one week to provide information for consideration of the appeal. The provost will return a decision on the appeal within one week of receiving all information, notifying both parties simultaneously of the outcome.

TITLE IX GRIEVANCE PROCEDURE: INVESTIGATION, HEARING, OUTCOMES, APPEAL (from the Student Code of Conduct)

Filing a Formal Complaint

When a Complainant is contacted following either a Report of Sexual Harassment or a Care Connection, along with the information about Supportive Measures, Complainants are provided information on filing a Formal Complaint to initiate a Title IX resolution process: either an informal Alternative Resolution Option or the formal Title IX Grievance Procedure. A signed Formal Complaint is required to initiate any Title IX resolution process where a binding decision can be issued (whether informal Alternative Resolution or the formal Title IX Grievance Process).

A Formal Complaint is a document submitted to the Title IX Coordinator by the Complainant alleging that a Respondent engaged in Prohibited Conduct and requesting an investigation. The preferred format to submit a Formal Complaint is through <https://tulane.edu/concerns>. However, it may be submitted to the Title IX Coordinator in person, by mail, or by electronic mail as well. The Complainant may also contact the Title IX Coordinator directly for assistance.

Additionally, a Report may allege certain facts that compel Tulane University to continue forward with an investigation if not file a Formal Complaint despite the Complainant choosing not to sign a Formal Complaint. Such circumstances may be present where a risk of imminent harm to an individual or others or a threat to the physical health and safety of the campus is determined to exist. After an evaluation of the available information, if such circumstances are present, a Formal Complaint can be filed and signed

by the Title IX Coordinator to continue the resolution process. If a Formal Complaint is initiated without the Complainant's participation, the Complainant will be notified and given an explanation of why the university is compelled to continue. Absent such extraordinary circumstances, the university will not proceed with its Formal Grievance Procedure without a participating Complainant.

Tulane may consolidate Formal Complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one party against the other party, where the allegations of Prohibited Conduct arise out of the same facts or circumstances.

Determining If Title IX Applies

The Title IX Coordinator or designee will be responsible for determining whether the reported conduct falls within Title IX jurisdiction as defined by the Title IX regulations. If so, Tulane may move forward with a filed Formal Complaint process as described in the previous section. If not, Tulane may be required to dismiss any Formal Complaint and route any adjudication of alleged misconduct instead through the Code's procedures for sexual misconduct. The Title IX Coordinator will evaluate reasonably available information to make the following determinations:

- Did the reported conduct occur within Tulane's Education Program or Activity? This must be answered in three parts:
 - a. Does Tulane have substantial control over the Respondent? *And,*
 - b. Does Tulane have substantial control over the context in which the conduct is reported to have occurred; or did the conduct occur in a building owned or controlled by a student organization that is officially recognized by Tulane? *And,*
 - c. Is the Complainant currently participating or attempting to participate in a Tulane Education Program or Activity?
- Did the reported conduct occur in the United States?
- Would the facts set forth by the report, if substantiated, constitute a violation of Sexual Harassment as defined by the Title IX regulations in Part I(C)(2) of this Appendix?

Based on the answers to these questions, the Title IX Coordinator will make a determination about scope and process. This is a threshold determination regarding scope and jurisdiction, which will determine appropriate next steps as follows:

- Where the answer to these three questions is **yes, and** a Formal Complaint is filed, Tulane will follow the formal Grievance Procedure required by the Title IX regulations and articulated in this Appendix in Part II. The Title IX Grievance Process includes a hearing with cross-examination by each parties' advisors, different evidence rules and limitations on the use of statements that have not been subject to cross-examination. The hearing will allow the participants to simultaneously see and hear each other but may be conducted remotely through videoconferencing technology.
- Where the answer to any of these three questions is **no, and** a Formal Complaint has been filed, Tulane will dismiss the allegations in the Formal Complaint related to Sexual Harassment as defined in the Title IX regulations in Part I(C) C of the Appendix. Tulane will proceed with a Student Conduct resolution process for any other allegations that, if true, may constitute prohibited conduct outside of the Title IX regulations; this includes non-sexual misconduct. Please refer to the Code of Student Conduct's Sections VII for the articulation of the Student Conduct Process.

The Title IX Coordinator or designee will provide written notice of the determination as to scope and jurisdiction to the Complainant or Reporting Party, refer that individual to the appropriate resources, including local law enforcement resources as applicable, and provide reasonably available Supportive Measures.

In the event a Respondent is charged with a non-sexual misconduct violation that is related to the report of Sexual Harassment, Student Conduct may also investigate and resolve the related conduct charge. If the Respondent is charged with a violation of another Tulane policy that is unrelated to the alleged violation of Title IX Sexual Harassment, Student Conduct shall coordinate its investigation and resolution as appropriate with any such investigation or resolution under the other applicable Tulane policy.

Appeals of the Dismissal of Formal Complaints

If a Complainant or Respondent would like to appeal the Title IX Coordinator's decision to dismiss a Formal Complaint, they may submit an appeal to the Senior Vice President for Academic Affairs and Provost or their designee within one week of receiving the dismissal. The other party will be notified about the filing of the appeal and will then have one week to provide information for consideration of the appeal. The provost will return a decision on the appeal within one week of receiving all information, notifying both parties simultaneously of the outcome.

Title IX Grievance Process

When a report of sexual misconduct is determined to fall within Title IX's definition for Sexual Harassment, it is no longer merely subject to Tulane's Code. The Department of Education has very specific rules for how Title IX Sexual Harassment must be handled. The investigation of Title IX Sexual Harassment matters is dictated by the May 2020 Amendments to the Title IX Federal Regulations (34 C.F.R. part 106) and is articulated in the process here. The University is committed to providing a prompt and impartial investigation and adjudication of all Formal Complaints alleging violations of this policy. During the Grievance Process, both parties (Complainant and Respondent) have equal rights to participate.

Presumptions of Good Faith and Non-Responsibility

The university presumes that reports of prohibited conduct are made in good faith. A finding that the alleged behavior does not constitute a violation of this policy or that there is insufficient evidence to establish that the alleged conduct occurred as reported does not mean that the report was made in bad faith. Further, the university makes no determinations as to the outcome of an allegation until the completion of an investigation; this includes a presumption that the Respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

In all proceedings under this policy, including at the hearing, the Complainant, the Respondent and the witnesses and other individuals sharing information are expected to provide truthful information.

Advisors

Throughout the Grievance Process, each party may have an Advisor of their choice; parties may change their advisor at any time during the Grievance Process. An Advisor is an individual chosen by a Complainant or a Respondent to provide guidance during the grievance process. An Advisor may be a member or non-member of the university community and may be an attorney.

The role of the advisor is narrow in scope: the Advisor may attend any interview or meeting connected with the Grievance Process, but the Advisor may not actively participate in interviews and may not serve as a proxy for the party, including in communications to the university. The Advisor may attend the hearing and may conduct cross-examination of the other party and any witnesses at the hearing; otherwise, the Advisor may not actively participate in the hearing.

If a party does not have an Advisor present at the hearing to conduct a cross-examination, the university will provide without fee or charge to that party an advisor selected by the university (who may be, but is not required to be, an attorney) to conduct cross-examination of the other party and/or any witnesses.

Any individual who serves as an advisor is expected to make themselves available for meetings and interviews throughout the investigation process, as well as the hearing, as scheduled by the university. The university (including any official acting on behalf of the university such as an investigator or a hearing panelist) has the right at all times to determine what constitutes appropriate behavior on the part of an advisor and to take appropriate steps to ensure compliance with this policy.

Tulane allows Complainants and Respondents to appoint an additional support person of their choice to attend the live hearing. This support person also has no formal role in the process and may not actively participate in the hearing (including speaking) in any way. Advisors are concerned with ensuring that students are able to respond to the information presented in the hearing; a support person is concerned only with the student and their wellbeing during what can be a stressful and emotional procedure. The university (including any official acting on behalf of the university such as an investigator or a hearing panelist) has the right at all times to determine what constitutes appropriate behavior on the part of an advisor and to take appropriate steps to ensure compliance with this policy.

Procedural Review

A Procedural Review is an informational meeting where the Director of Student Conduct overviews Tulane's investigation and adjudication procedures.

A Procedural Review can happen before or after a Formal Complaint has been filed. Having a Procedural Review **does not** initiate the conduct process unless a Complainant expressly states they want to initiate that process; in Title IX matters, the conduct process cannot be initiated without a signed Formal Complaint. While a Complainant can file a Formal Complaint without having a Procedural Review first, it is strongly encouraged. Complainants will be given the information to file a Formal Complaint following their Procedural Review. If a Formal Complaint is filed before a Procedural Review, one will be scheduled promptly. Respondents will be contacted for a Procedural Review following the notice of investigation.

As explained in the Code, Procedural Reviews are available for all conduct cases, not just sexual misconduct and/or Title IX Sexual Harassment, and for both Complainants and Respondents. During the Procedural Review, students will learn about the conduct investigation process in detail, including all rights, privileges and responsibilities.

Students will also learn about the available Supportive Measures in place to help students navigate this process. Students will also learn details about communication and timeline. Students will receive a written summary of the meeting for their reference. Advisors may also join students in this meeting.

Informal Resolution Process

Subject to the consent of the parties and the approval of the Title IX Coordinator, the University permits informal resolution processes in cases in which a formal complaint has been filed with the Title IX Coordinator. Subject to approval by the Title IX Coordinator, the informal resolution process is available in matters involving a student Complainant and a student Respondent as well as in matters involving a faculty/staff Complainant and a faculty/staff Respondent; the informal resolution process is not available in matters involving a student and an employee.

The informal resolution process is a voluntary, remedies-based process designed to provide parties with an option to resolve disputes with other students in a forum that is separate and distinct from the University's formal grievance processes under the Title IX Sexual Harassment policy. The purpose of the informal resolution process is to address the conduct which has been reported by the Complainant and place the parties in a position to pursue their academic and nonacademic interests in a safe, respectful and productive educational and working environment. Under this process, there will be no disciplinary action taken against a Respondent and the resolution will not appear on the Respondent's disciplinary record unless both parties agree to these outcomes.

The University may facilitate the informal resolution process prior to conducting a hearing. Before the informal resolution process is used, both parties must provide voluntary, written consent to the informal resolution process and must receive written notice disclosing: the allegations, the requirements of the informal resolution process (including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations), and any outcomes resulting from participating in the informal resolution process (including the records that will be maintained or could be shared). At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the Title IX Sexual Harassment grievance process with respect to the formal complaint.

The University will not require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to an investigation and adjudication of formal complaints of Title IX Sexual Harassment. Similarly, the University will not require, encourage, or discourage the parties from participating in the informal resolution process.

Investigation

Following the receipt and review of the formal complaint by the university Title IX Coordinator, and it being determined that the matter properly falls under this Title IX Sexual Harassment policy, the parties will be informed in writing of the initiation of the investigation. The written information shall include:

- The identities of the parties, if known.
- A concise summary of the alleged conduct at issue (including when and where it occurred, if known).
- Notice of the allegations potentially constituting Title IX Sexual Harassment.
- A statement that the Respondent is presumed not responsible and that a determination regarding responsibility is made at the conclusion of the grievance process.
- A statement informing the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney.
- A statement informing the parties that they may request to inspect and review evidence.
- A statement informing the parties that knowingly making false statements or knowingly submitting false information during the grievance process may constitute a violation of university policy.

- Information regarding the applicable grievance procedures, including the informal resolution process.

If, during the investigation, additional information is disclosed that may also constitute prohibited conduct under this policy, the Respondent and Complainant will be informed in writing that such additional information will be included in the grievance process.

This investigation process will continue forward as explained absent the parties agreeing to use an informal resolution.

Investigation Timeline: The Office of Student Conduct endeavors to complete the fact-finding portion of investigations within 90 calendar days. This timeframe may be extended for good cause, which may include, but is not limited to: illness, academic breaks or holidays, unavailability of involved parties or witnesses, concurrent criminal investigations, the complexity of the allegations or competing demands from other cases.

Collection of Evidence

The investigators will collect information from each party. While the Complainant and the Respondent are not restricted from gathering and presenting relevant evidence, the investigators are responsible for gathering relevant evidence to the extent reasonably possible. However, each party will be given an equal opportunity to suggest witnesses; provide other relevant information, such as documents, communications, photographs and other evidence; and suggest questions to be posed to the other party or witnesses. Parties and witnesses are expected to provide all available relevant evidence to the investigators during the investigation. If a party or witness fails to provide available relevant evidence during the investigation, such evidence may, at the discretion of the Decision Maker, be excluded from consideration at the hearing. While parties are not restricted from presenting information attesting to the parties' character, such evidence generally is not considered relevant.

Investigators will draft a complete investigative report, outlining material facts (those in dispute and not in dispute); collecting all Respondent, Complainant and relevant witness and impact statements; asking any needed follow up questions; and collecting and organizing all relevant evidence. The investigator will evaluate all relevant evidence – including both inculpatory and exculpatory evidence. This report will be reviewed by the Director of Student Conduct and the Title IX Coordinator for compliance and consistency purposes.

Credibility determinations will not be based on a person's status as a Complainant, Respondent or witness.

Hearing Process

The report will then be turned over to a separate decision maker for adjudication. The decision maker may gather additional information, including speaking with any identified party.

The decision maker will then preside over a live hearing, in which advisors of both the Respondent and Complainant may cross-examine any individual that has made a statement or provided evidence, including any and all witnesses, the Respondent or the Complainant. Each party must be represented by an advisor. If the Complainant or Respondent does not have an advisor, the university will provide one. If the student's chosen advisor does not appear, the university will appoint an advisor to provide cross-examination of the evidence on the student's behalf. The decision maker will determine if a question or evidence is relevant

or admissible. The decision maker may question witnesses, the Respondent and Complainant. At no time will advisors answer on behalf of their students.

The Decision Maker will have absolute discretion with respect to administering the hearing. The Decision Maker will decide whether evidence and witnesses are relevant or irrelevant, with the understanding that the introduction of relevant evidence and witnesses will always be permitted. The Decision Maker will be responsible for maintaining an orderly, fair and respectful hearing and will have broad authority to respond to disruptive or harassing behaviors, including adjourning the hearing or excluding the offending individual, including a party, witness or advisor.

Hearings are typically conducted virtually, using technology that allows all parties, witnesses, and other participants to simultaneously see and hear each other. If a hearing is required to be held in person, that decision will be made by the Director of Student Conduct or designee in consultation with the Title IX Coordinator. Only after a determination is made that the hearing will be held in person, and at the request of either party, the University will provide for the parties to be located in separate rooms, using technology that enables the decision maker and the parties to simultaneously see and hear the party or witness answering questions.

While the hearing is not intended to be a repeat of the investigation, the parties will be provided with an equal opportunity for their advisors to conduct cross examination of the other party and/or of relevant witnesses. A typical hearing may include brief opening remarks by the Decision Maker; questions posed by the Decision Maker to one or both of the parties; questions posed by the Decision Maker to any relevant witnesses; and cross-examination by either party's advisor of the other party and relevant witnesses.

The parties' advisors will have the opportunity to cross examine the other party (and witnesses, if any). Such cross examination must be conducted directly, orally and in real time by the party's advisor and never by a party personally.

Only relevant cross examination questions may be asked of a party or witness.

Before a party or witness answers a cross-examination question that has been posed by a party's advisor, the Decision Maker must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

If the Complainant or the Respondent informs the university that they will not attend the hearing (or will refuse to be cross-examined), the hearing may proceed, as determined by the university's Title IX Coordinator. The Decision Maker may not, however draw any adverse inference in reaching a determination regarding responsibility based solely on the individual's absence from the hearing (or their refusal to be cross-examined).

Representatives from the Office of Student Conduct and the Title IX Office may attend the hearing. Other University administrators may attend the hearing at the request of, or with the prior approval of, the Decision Maker, but the parties will be notified in advance of anyone else who will be in attendance. The decision maker will make a finding of responsible or not responsible for all charges and provide a rationale for each finding. The decision maker will make an independent decision based on a thorough review of all relevant evidence collected.

The University will create an audio or audiovisual recording, or a transcript, of any live hearing and will make it available to the parties for inspection and review.

The Decision Maker shall write a written determination, which will contain: (1) the allegations potentially constituting Title IX sexual harassment; (2) a description of the procedural steps taken from the receipt of the formal complaint through the determination (including any notifications to the parties, interviews with parties and witnesses, site visits (if any), methods used to gather other information and the hearing); (3) findings of fact supporting the determination; (4) conclusions regarding the application of this policy to the facts; (5) a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility (i.e., whether a policy violation occurred), any disciplinary sanctions imposed by the Sanction Officer if there has been a finding of responsibility and whether any remedies designed to restore or preserve equal access to the university's education program or activity or working environment will be implemented; and (6) relevant appeal information for the parties.

If there is a finding of responsibility, the decision maker will consider the scope of the case, impact on students and community and prior history when assigning sanctions. The decision maker will also decide if remedies are appropriate in order to restore or preserve equal access to their education at the university. Such remedies may include the same individualized services described as "Supportive Measures;" however, unlike Supportive Measures, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent. All sanctions and remedies must be approved by the Director of Student Conduct and the Title IX Coordinator upon completion; cases will be turned over to the Office of Student Conduct and the Title IX office and any other appropriate administrators for sanction and remedy implementation.

A Respondent in these cases may acknowledge responsibility at any time and accept sanctions imposed by the Office of Student Conduct. A Complainant may withdraw the complaint at any time. Either of these occurrences would cease any investigation.

Sanction

Sanctions are designed to uphold Tulane University's values, promote accountability and support a safe and respectful learning environment. The student conduct process emphasizes education, restoration and community well-being while holding students responsible for their actions. Sanctions are intended to:

- Educate students about the impact of their behavior.
- Encourage ethical decision-making and future compliance with University policies.
- Restore harm caused to individuals or the Tulane community.
- Deter future violations through appropriate consequences.
- Ensure campus safety and uphold community standards.

Sanctions are applied on a case-by-case basis, considering the nature and severity of the violation, mitigating and aggravating factors, and the student's conduct history.

A. Types of Sanctions

The following sanctions may be imposed individually or in combination, depending on the circumstances of the case:

Educational and Developmental Sanctions

1. Reflection Assignments – Writing assignments or projects designed to encourage self-reflection on the impact of one's actions.

2. Workshops or Training Programs – Required participation in educational sessions on topics such as alcohol use, conflict resolution, ethics, or community responsibility.
3. Restorative Practices Measures – Participation in restorative conferences, mediation, or community reconciliation efforts.
4. Community Service – Assignments benefiting the Tulane or New Orleans community, designed to reinforce responsibility and civic engagement.
5. Mentorship or Coaching – Required meetings with a faculty or staff mentor to discuss personal and academic development.
6. Behavioral Intervention – Required counseling, substance abuse treatment, drug testing, or other intervention services.

Disciplinary Sanctions

1. Warning – A formal written notice that a violation has occurred and that future misconduct may result in more severe sanctions.
2. Disciplinary Probation – A designated period during which a student must demonstrate good conduct. Further violations while on probation may result in suspension or expulsion.
3. Loss of Privileges – Temporary or permanent restriction of certain University privileges, such as leadership positions, participation in events or access to facilities.
4. University Housing Restrictions – Reassignment, removal from campus housing, or restrictions on future housing eligibility.
5. No-Contact Orders – Prohibition of direct or indirect contact with specific individuals as a protective measure.
6. Suspension – Separation from the University for a specific period, after which the student may apply for readmission. Conditions for reinstatement may be required.
7. Expulsion – Permanent separation from the University with no opportunity for readmission.

Organizational Sanctions

1. Probationary Status – The organization is placed on probation for a designated period and must adhere to specific behavioral expectations.
2. Loss of Event Privileges – Restrictions on hosting events, social functions, or organizational activities.
3. Fines or Restitution – Financial penalties or reimbursement for damages caused.
4. Educational or Risk Management Training – Required participation in training programs focused on organizational responsibility and risk reduction.
5. Loss of University Recognition – Revocation of the organization's registered status, preventing it from functioning as a recognized student group.

Additional Remedies

In addition to disciplinary actions, the University may impose remedial measures designed to support affected individuals and the broader community. These may include:

- Adjustments to academic, housing, or employment arrangements.
- Campus safety measures, including escort services or changes in class schedules.
- Resources and support referrals to counseling, wellness programs or advocacy services.

B. Determining Sanctions

Sanctions are determined based on several factors, including:

1. Severity of the Violation – The seriousness of the behavior and the degree of harm caused.
2. Intent and Motivation – Whether the conduct was intentional, reckless, or negligent.

3. Impact on the Community – The extent to which the behavior affected others, including students, faculty, staff and the broader Tulane community.
4. Prior Conduct History – Whether the student or organization has previous violations and their nature.
5. Acceptance of Responsibility – Whether the student or organization took accountability and demonstrated willingness to correct the behavior.
6. Mitigating or Aggravating Circumstances – Factors that lessen or increase the severity of the violation, such as efforts to repair harm or repeated violations.

C. Failure to Comply with Sanctions

Failure to complete assigned sanctions within the required timeframe may result in:

- Additional sanctions, such as extended probation or increased restrictions.
- Holds on academic records, registration or graduation eligibility.
- Referral for further disciplinary action, including suspension or expulsion.

The Office of Student Conduct is responsible for monitoring compliance with assigned sanctions and may impose additional consequences for non-compliance.

Appeal

Students found responsible for violating Tulane's Code of Conduct in Major Matters and Title IX Matters have the right to appeal both the finding of responsibility and the sanctions imposed, but only on specific grounds. Complainants in Title IX Matters also have the right to appeal on the same limited grounds.

Appeals must be submitted within ten (10) business days of receiving the final written decision. Requests for an extension must be submitted in writing to the Director of Student Conduct, who has discretion to grant or deny such requests based on the circumstances.

Appeals must be based on one or more of the following valid grounds:

- Procedural Error – A significant deviation from established procedures that materially affected the outcome, including allegations of bias or a conflict of interest.
- New and Substantial Evidence – Evidence that was not reasonably available at the time of the original determination and that could significantly impact the findings.
- Disproportionate Sanctions – Sanctions that are excessively severe in relation to the violation or, in cases where the Complainant is appealing, sanctions that are insufficient given the severity of the misconduct.
- Bias or Conflict of Interest (Title IX Cases Only) – The Investigators, Decision Makers or Title IX Coordinator had an actual conflict of interest or demonstrated bias that may have materially impacted the findings or sanctioning process.

Appeals must be submitted in writing to the Director of Student Conduct and must include:

- A clear and concise statement outlining the specific grounds for appeal.
- Any supporting documentation or new evidence (if applicable).

Once received, the Director of Student Conduct will acknowledge the appeal and determine whether it was filed on time and meets the specific appeal criteria. Appeals that fail to meet the valid grounds for appeal will be denied without further review.

If the appeal is properly filed, the Director of Student Conduct will convene a three-member appellate panel to review the appeal. This panel is composed of trained faculty and staff from an established appeals panel pool. The appellate panel may allow impacted individuals (such as the Complainant or Respondent) to review the appeal and provide their perspectives in writing before making a decision. If multiple parties appeal, the panel will review all appeals as part of a single process.

The appellate panel does not re-hear cases but instead conducts a review of the existing case record and any new evidence presented in the appeal. The panel may consult the original investigator, hearing panel chair, or conduct officer to clarify issues related to the appeal.

Depending on the nature of the appeal, the appellate panel may take one of the following actions:

- Uphold the original decision regarding responsibility and sanctions.
- Modify the sanctions to ensure they are fair, proportionate and appropriate given the circumstances.
- Remand the case for reconsideration, directing the original conduct officer or hearing panel to correct procedural errors, assess new evidence, or reassess the imposed sanctions.

A case will not be remanded more than once for reconsideration.

The appellate panel will endeavor to issue a written decision via email within ten (10) business days of receiving the appeal. If additional time is needed due to the complexity of the appeal or availability of key information, the student will be notified in writing, and a revised timeline will be provided.

All appeal decisions are final. However, if a remand leads to a new decision, that new decision may be subject to one additional appeal under the same criteria.

TITLE IX GRIEVANCE PROCEDURE: INVESTIGATION, HEARING, OUTCOMES, APPEAL (from the Equal Opportunity Anti-Discrimination Policy)

Complaint Procedures

The Equal Opportunity & Resolution Management Department investigates complaints that allege an Employee or Third-Party may have violated Tulane's Equal Opportunity/Anti-Discrimination Policy. As previously noted in Section IV, complaints against Students, including Title IX complaints, will be processed as outlined in Tulane's Code of Student Conduct (the Code). Complaints against faculty will be processed in accordance with Tulane's Faculty Handbook and the Bylaws of the university Senate. Complaints against all others will be processed in accordance with the Staff Handbook. All others may include (though are not limited to) Staff, Administrators, Librarians, Post-Doctoral Candidates, Resident Assistants, Graduate Teaching Assistants and other student-employees and faculty on appointments of less than a year or on the first year of appointment. Title IX Complaints against faculty and all others will be processed in accordance with the Amendment to this Policy, found in Appendix B. The complaint procedures are intended to ensure the rights of the Parties and accord equity and due process.

Form of Complaint: Complaints of discrimination, harassment and/or retaliation should be put into writing. If you require reasonable accommodation in filing a complaint, or putting it into writing, the Equal Opportunity & Resolution Management Department can assist with this. Anonymous complaints will be accepted and investigated to the extent possible. Complaint forms are available at the Equal Opportunity & Resolution Management Department 504-862-8083 or may be filed online at <http://tulane.edu/concerns>.

Content of Complaint: Anyone who has information about someone being discriminated, harassed or retaliated against in violation of this policy, or who believes that they have been discriminated, harassed, or retaliated against in violation of this policy should promptly file a complaint with the following information, if known:

- 1) Name and contact information of the Complainant or injured party;
- 2) Brief description of the offending behavior, including times, places people involved;
- 3) Names or identifying information about the Respondent and anyone with relevant information about the alleged discrimination, harassment and/or retaliation

Reporting Timeframes: The university's ability to respond may diminish over time, as evidence may erode, memories may fade, and Respondents may no longer be affiliated with the university.

However, there is no time limit for reporting prohibited conduct. Reports should be made as soon as possible after the incident, preferably within one year, because the passing of time makes a review of the evidence more difficult and the memories of involved parties may become less reliable.

Predominant Roles of Respondents: As noted above, complaints against students will be processed as outlined in the Code whereas, complaints that allege an Employee or Third-Party may have violated university Equal Opportunity/Anti-Discrimination Policy is investigated by the EO. If a question arises about someone's status, or the predominant role of the Respondent, the Equal Opportunity & Resolution Management Department will determine which policies and procedures apply based on the facts and circumstances, such as which role is predominant in the context of the Prohibited Conduct. Further, where a Respondent is both a Student and an Employee, the Respondent may be subject to any of the sanctions applicable to either Students or Employees.

Failure to Cooperate: Failure to cooperate in an investigation can be considered a breach of responsibility. Notice of such non-cooperation will be communicated to the appropriate supervisory authority over the non-cooperative individual (such as Student Conduct, Department Head, Supervisor or Dean), so appropriate action may be taken.

A party's failure to cooperate in an investigation or formal review proceeding may result in the investigation proceeding solely on the basis of the available evidence. A Respondent's silence or lack of cooperation will not prevent an investigation from moving forward. If a Respondent fails to cooperate in an investigation, their Department Head, Supervisor, Dean, and/or the Office of Student Conduct will be notified of such non-cooperation so appropriate action may be taken.

Employees must report information about a possible violation of this policy. Employees who fail to cooperate or timely report all relevant details (obtained directly or indirectly) about an incident of prohibited conduct that is made known to them about a matter covered by this policy will be considered to have breached their responsibility to the university. The Department Head, Supervisor, or Dean with supervisory authority over a non-cooperative employee will be notified of such non-cooperation so appropriate action may be taken.

Investigation Process

A. Overview

It is not necessary for a Complainant to first confront the harasser prior to instituting a complaint under this policy.

Privacy: The person charged with investigating the complaint will only discuss the complaint or the underlying behavior with those involved in the case who have a need to know the information, including, but not limited to, the Complainant, the Respondent and applicable Supervisors.

Objectivity: The Complainant and Respondent are entitled to an investigation conducted by an impartial investigator. Thus, if the person charged with overseeing or investigating a complaint is implicated in the complaint or has any personal issue that would cause a conflict of interest, the person with the conflict shall recuse themselves from the proceeding. If a conflict of interest exists, the EO may designate an impartial third-party to conduct the investigation and make findings.

Standard of Review: Formal Resolution of Complaints will be investigated and reviewed based upon the preponderance of evidence standard. Preponderance of the evidence means that it is more likely than not that a policy violation occurred.

Initial Inquiry: The Equal Opportunity & Resolution Management Department has the authority to investigate a concern, provided evidence is available to support an effective investigation. When the Equal Opportunity & Resolution Management Department receives a report of discrimination, harassment, and/or retaliation, the EO (or their designee) will begin an initial inquiry as soon as practicable—generally within seven working days, absent extenuating circumstances. The Equal Opportunity & Resolution Management Department will review the complaint and attempt to gather information as appropriate. The inquiry often begins with an attempt to gain additional information from the Complainant, preferably through an in-person meeting. Further action by the EO will depend upon a number of factors, including but not limited to: (1) whether the identity of the Complainant and/or Respondent (the accused) is known; (2) whether the Complainant is willing to participate in an investigation; (3) whether the Complainant requests anonymity or confidentiality; (4) whether the Complainant or Respondent is affiliated with the university; and (5) whether the university has a legal obligation to proceed with an investigation based on the nature of the conduct alleged—regardless of the Complainant’s wishes.

If a Respondent is no longer affiliated with the university, the university will provide reasonably appropriate remedial measures to the extent feasible; assist the Complainant in identifying external reporting options; and take reasonable steps to eliminate prohibited conduct, prevent its recurrence and remedy its effects.

Complaints against Students: Students are bound by the principles outlined in this policy. However, complaints against students shall be resolved under the Code of Student Conduct.

Complaints against Faculty: Faculty are bound by the principles outlined in this policy. However, complaints against Faculty shall be resolved by the process set forth in the Faculty Handbook and the Bylaws of the University Senate. Specifically, the Faculty Senate Committee on Equal Opportunity and Anti-Discrimination shall hear grievances against faculty alleging violations of university Equal Opportunity and Anti-Discrimination policies that cannot be resolved informally. The committee does not have jurisdiction over grievances against faculty on appointments of less than a year or on the first year of appointment.

Complaints against Staff and All Others: Staff and all others are bound by this policy. Complaints against staff and all others will be processed in accordance with this policy and the Staff Handbook. All others may include (though are not limited to) individuals not governed by the processes set out in the Code of Student Conduct or Faculty Handbook and the Bylaws of the University Senate, such as Administrators,

Librarians, Post-Doctoral Candidates, Resident Assistants, Graduate Teaching Assistants, other Student-Employees and Faculty on appointments of less than a year or on the first year of appointment.

Complaints Involving Federal Regulation Sexual Harassment: Complaints involving Sexual Harassment that meets the definition provided by the Title IX (20 U.S.C. § 1681, and its implementing regulations at 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex) will be processed in accordance with Appendix B of this policy.

Investigation Timeline: Investigations will commence as soon as practicable following the Initial Inquiry process detailed above. Investigations will be conducted as expeditiously as possible and are usually completed within a reasonable period, typically 60 days, though this may vary based on the availability of parties and witnesses, breaks in the academic calendar, scope of the investigation or unforeseen or exigent circumstances. If additional time is needed to conduct a thorough investigation, the EO may, at its discretion, extend the time for completing the investigation as reasonably necessary. The EO will notify the Complainant and Respondent of any extensions. The Complainant, Respondent, and appropriate supervisors will receive regular updates on the status of the investigation.

Complaint Withdrawal: Prior to the conclusion of an investigation, the Complainant may request to withdraw their complaint by contacting the Equal Opportunity & Resolution Management Department in writing at eo@tulane.edu. The Equal Opportunity & Resolution Management Department weighs the wishes of the Complainant heavily when deciding whether to pursue a Formal Investigation. In some cases, the EO may determine, given the nature of the allegation(s) and information presented, that the university has an obligation to proceed with a Formal Investigation.

Sometimes a Complainant does not want to pursue a Formal Investigation or there is not enough information to proceed with a Formal Investigation. In such instances, the Equal Opportunity & Resolution Management Department may proceed with Informal Resolution. Informal resolution may be requested by a party at any time. Informal Resolution does not result in findings of responsibility or sanctions. It is not required that parties use Informal Resolution. Anyone who believes that they have been subject to discrimination may immediately pursue Formal Investigation and Resolution. Informal Resolution may be an appropriate choice when the alleged conduct is not of a serious or repetitive nature, and disciplinary action is not required to remedy the situation. Depending on the nature and severity of the complaint and the wishes of the person(s) alleging discrimination, harassment and/or retaliation, Informal Resolution may include, but is not limited to, the following or other appropriate actions:

- 1) Advising the Complainant about how to communicate the unwelcome nature of the behavior to the alleged harasser;
- 2) A facilitated conversation between the Complainant and Respondent to work out an agreed upon resolution;
- 3) A recommendation for mediation between the Complainant and the Respondent. Mediation is an informal meeting, facilitated by the Conflict Resolution Specialist, to help the Complainant and Respondent explore possible ways to reach a resolution;
- 4) A verbal or written warning to cease current behavior or a cease contact directive;
- 5) Training and/or an educational conversation with the Respondent; and/or
- 6) Distributing a copy of this policy to Respondent's department.

Informal Resolutions will be completed within a reasonable amount of time from receipt of a request to proceed under the Informal Process. Students are also encouraged to seek advice or counseling from the Office of Student Conduct, 504-865-5516, and/or the Office of Student Resources and Support Services,

504-314-2160, to decide whether or not they will pursue a Formal Complaint. Informal Resolution may not be appropriate in certain circumstances, and the Equal Opportunity & Resolution Management Department retains the right to determine that a complaint is not appropriate for Informal Resolution.

For instance, Informal Resolution may not be appropriate in cases involving allegations of sexual assault, even on a voluntary basis. In addition, complaints brought by students against employees involving Sexual Harassment as defined by the May 2020 Title IX regulations cannot be resolved informally. While dealing informally with a problem of discrimination, harassment or retaliation may be preferable to the Complainant, university Formal Investigation Process must (34 CFR § 106.45(b)(9)(iii)) be followed for Tulane to impose any discipline on the Respondent.

Formal Investigation & Resolution of Complaints

The university will proceed with a formal investigation and resolution when deemed appropriate by the Equal Opportunity & Resolution Management Department.

With regard to faculty, the formal investigation and resolution process is outlined in the Faculty Handbook shall apply and set forth as follows:

The university Senate's Committee on Equal Opportunity and Anti-Discrimination Grievances Against Faculty (the Committee) has executive responsibility to consider grievances alleging faculty violations of university Equal Opportunity/Anti-Discrimination policies, make findings and recommend remedial actions and/or sanctions to the Senior Vice President for Academic Affairs and Provost. This process does not apply to faculty on appointments of less than a year or on the first year of appointment. Those grievances are handled directly by the Equal Opportunity & Resolution Management Department (EO) and Human Resources.

All members of the Committee receive training by the EO and others as necessary, on issues connected with potential violations of university Equal Opportunity/Anti-Discrimination Policies (EO Policies).

The Committee shall hear grievances alleging faculty violations of university Equal Opportunity and Anti-Discrimination policies that cannot be resolved informally by the EO. The committee does not have jurisdiction over grievances against faculty on appointments of less than a year or on the first year of appointment. Those grievances are handled directly by the EO and Human Resources.

In cases where there are complaints that involve more than one faculty member Respondent, the Committee shall have the discretion to hear the grievance jointly, even if one of the faculty had an appointment of less than a year and/or is in their first year of appointment.

The Chair of the Committee shall have discretion to decide whether a party to a complaint has standing to proceed before the Committee against a faculty member. The Committee's jurisdiction replaces that of the grievance committees of the individual schools, Newcomb Tulane College, and/or Centers/Institutes.

Investigative Process:

Initial Review by EO: When a grievance comes to the attention of the EO, they will conduct a review to determine whether the matter sufficiently states a grievance under the university's Equal Opportunity/Anti-Discrimination Policies (the EO Policies) that it should proceed to the investigative process. The EO should provide written notice of its initial determination to the appropriate parties

within 30 working days. If the EO cannot make the 30-day deadline, it shall communicate the reasons to the parties in writing. If the EO determine there is no basis for an investigation, the Complainant may appeal that decision to the chair of the committee.

EO Investigation: The EO will conduct an investigation of the complaint. The EO shall issue a written notice of investigation to the parties stating the charge(s). The EO shall also provide all parties with a written statement regarding their rights and an explanation of the investigation process. The investigation is meant to provide a fair and reliable gathering of the facts (including interviewing witnesses and gathering relevant and available evidence). The EO should provide the Complainant and Respondent with a fair and equal opportunity to be heard, to submit information, and to identify witnesses who have relevant information. The EO's investigator may speak with individuals who are willing to participate and have relevant information. Each party may bring an advisor to any meetings. The advisor may be a university employee or an attorney. At meetings, the advisor may not speak for either the Complainant or the Respondent.

Timing of Investigation: Best efforts should be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness. In general, EO will seek to conclude the investigation within 30 working days from the issuance of the notice of investigation, although special circumstances may extend this time frame. The time frame for completion of the investigation, or any designated time frames of steps in the investigation, may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, to comply with a request by external law enforcement, to accommodate the availability of witnesses, to account for university breaks or vacations, to account for complexities of a case (including the number of witnesses and volume of information provided by the parties) or to address other legitimate reasons as defined by the investigator. Any extension of the timeframes, and the reason for the extension, should be shared with the parties in writing.

EO's Final Report: Within a reasonable time, following receipt of any additional information from the parties and/or individuals involved in the process, or after the ten working day comment period has lapsed without comment, the investigator will make a final investigative determination, by a preponderance of the evidence standard, regarding whether a violation of the EO Policies occurred. The final report shall be made available to the Complainant and Respondent.

Panel Review: Within five working days of completion, the EO shall submit its final report and make available to the Chair of the Committee all evidence collected. The Chair of the Committee shall then, within a reasonable time, assemble a review panel. A panel shall consist of five members of the Committee. Four members constitute a quorum. No one shall participate on a panel if they have a conflict of interest as determined by the chair. Committee members with a conflict of interest, such as a close relationship with either the Complainant or Respondent, shall be recused with the final authority for resolving conflicts of interest resting with the Committee chair.

Appeals: The Respondent and/or the complaint(s) have the right to appeal disciplinary findings and actions short of dismissal to FTFR, see Faculty Handbook, Chapter 7. In the case of a notice of dismissal, the case is referred to FTFR for a dismissal hearing as described in Chapter 7.

As to all others covered by this policy, the formal investigation and resolution process is set forth as follows:

During a formal investigation, the Complainant will have the opportunity to describe their allegations, as well as present supporting witnesses or other evidence. Complaints of discrimination, harassment, and/or retaliation must be put into writing. Upon request, Complainants will be provided a written copy of their allegations. The Respondent will have the opportunity to receive written notice of each allegation, respond to each allegation, present their evidence supporting their position and propose relevant witnesses. The investigator will review evidence presented and will, as determined appropriate, meet with additional witnesses identified as having relevant information. In some instances, the investigator may identify and communicate with witnesses who were not identified by the Complainant or Respondent. Investigation meetings are not recorded by Tulane and may not be recorded by any participant. Parties and witnesses may take notes during investigation meetings. All parties involved in the investigation are expected to maintain privacy, cooperate and provide truthful information throughout the investigation process. If a reasonable accommodation in filing a complaint is needed, please contact the EO at 504-862-8083 or eo@tulane.edu.

Support Person: As specified in Appendix B, Title IX matters require Advisors. For non-Title IX matters involving sex discrimination (or as otherwise expressly permitted by other university policies) Complainants and Respondents may be accompanied by one Support Person throughout the investigation, provided the involvement of this Support Person does not result in an undue delay of the process. A Support Person acts as an advisor and may be an attorney but cannot be someone who is a witness or party in the matter (or a related matter). It is the responsibility of each party to coordinate scheduling with their Support Person for any meetings. A Support Person is someone who can accompany and support a Complainant or Respondent throughout an investigation but may not otherwise participate in an investigation or on anyone's behalf. A Support Person may not speak, write, or otherwise communicate on behalf of the Complainant or Respondent with an investigator or others affiliated with the investigation, including during an appeal of an investigation. If a conflict exists between the formal investigation and resolution process described in the Faculty Handbook for faculty investigations and this policy, the terms in the Faculty Handbook govern. A support person may not be affiliated with the investigation, including an appeal of an investigation. A Support Person may not engage in advocacy or behavior that harasses, abuses or intimidates others, including parties, witnesses or individuals involved in resolving the complaint. Any Support Person who does not abide by these guidelines may be excluded from the process.

Closing the Case: The EO will review all relevant information obtained during the Formal Investigation. After its review, the EO may decide to close the case when: (1) there is insufficient information to move forward; (2) the Complainant refuses to cooperate or pursue; or (3) when the alleged misconduct, even if substantiated, does not result in a violation of this policy. The EO may reopen a matter if additional information later becomes available or a Complainant who was unwilling to participate in an investigation changes their mind.

Written Determination: At the conclusion of a Formal Investigation, the EO will issue the Complainant and Respondent a final written determination in the form of a Notice of Outcome or Closing Letter, no more than ten working days or as promptly as possible after a decision has been reached. This written determination will state whether, based on the investigation, there was a finding of a violation of this policy. Closing letters will contain enough information to provide notice to the parties of the allegations, review process determination and for Title IX matters provide sufficient information so a party has an opportunity to form a reasoned appeal argument if they so choose.

Violations: Upon a finding of a violation of this policy, the EO (or the designated fact finder) may make recommendations for further action, including sanctions, to the appropriate supervisor and division head

for the Respondent and/or those able to implement appropriate corrective action. Appropriate recommendations are designed to stop the prohibited conduct, prevent its reoccurrence and address any adverse effects caused by the violation. The supervisor or division head will be responsible for deciding upon and imposing disciplinary action as soon as reasonably possible, generally within a month after receiving the final determination and recommendation of the EO. The supervisor or division head shall notify the EO of the sanction imposed. Tulane's ability to take appropriate corrective action against at Third-Party will be determined by the nature of the relationship of the Third-Party to the university. The EO (or its designee) will determine the appropriate manner of resolution consistent with the university's commitment to a prompt and equitable process, as well as university obligations, federal law, federal guidance and this policy.

Sanctions: The EO does not have independent authority to impose sanctions.

- Sanctions against Students shall be imposed under the Code of Student Conduct.
- Sanctions against Faculty shall be imposed by applicable university policies as maintained in the Faculty Handbook and in the Bylaws of the university Senate.
- Sanctions against all others shall be imposed under the Staff Handbook. All others may include (though are not limited to) Staff, Administrators, Librarians, Post-Doctoral Candidates, Resident Assistants, Graduate Teaching Assistants, other Student-employees and faculty on appointments of less than a year or on the first year of appointment.

Sanctions imposed on individuals who have violated this policy will be commensurate with the severity and/or frequency of the conduct and shall be adequate and sufficient to prevent such conduct in the future. Sanctions may include, but are not limited to, an apology to the Complainant; a verbal or written reprimand; a requirement to attend remedial discrimination and harassment training; appropriate workplace restrictions; no contact orders; denial of a merit pay increase or other benefit; denial of promotion; or reassignment, demotion, suspension or separation from the university.

APPEALS

Appeals regarding the outcome of complaints shall be resolved as follows:

- Appeals against Students shall be resolved under the Code of Student Conduct.
- Appeals against Faculty shall be resolved by applicable university policies as maintained in the Faculty Handbook and in the Bylaws of the university Senate.
- Appeals against all others, which may include (though are not limited to) Staff, Administrators, Librarians, Post-Doctoral Candidates, Resident Assistants, Graduate Teaching Assistants, other Student-employees and faculty on appointments of less than a year or on the first year of appointment, will proceed pursuant to the process outlined herein.

A Complainant or Respondent may seek to appeal the findings and outcome of a matter that was Formally Investigated pursuant to this policy and resulted in a written determination. A request for appeal must be filed, in writing, to the Director of the EO (1555 Poydras Street, Suite 964, New Orleans, LA 70112 or eo@tulane.edu) no later than 5:00 p.m. on the tenth business day following the date of the EO's written notice of the outcome of the investigation. Appeals will be considered only where the request demonstrates one of the following enumerated grounds for appeal:

- 1) Procedural errors that significantly impact the outcome. This means demonstrated material deviation from procedures causing the findings and determination about responsibility, or the sanctions imposed, to be substantially impacted.
- 2) New and Substantial evidence. The party requesting appeal must produce germane, new and substantial evidence that could not have been reasonably discovered before a determination

about responsibility was made, and such new evidence objectively and significantly impacts the outcome about whether this policy was violated.

- 3) Grounds for appeal as articulated in Appendix B for Federal Regulation Sexual Harassment matters.

Once an appeal has been received, the non-appealing party will be provided with a copy of the appealing party's written statement and may submit a written response to the EO within ten business days of receipt of the appealing party's written statement. The non-appealing party's statement will be provided to the appealing party. No further appeal submissions from the parties shall be permitted.

The appeal shall be reviewed by the Associate Vice President of Human Resources. In exceptional circumstances, as determined by the EO or the Office of General Counsel, an appeal may be reviewed by an outside, neutral third-party. In consultation with the EO and/or the Office of General Counsel (and in Title IX matters, the university's Assistant Provost for Title IX Compliance and Education), a party designated to review a matter may delegate the review of an appeal to a designee. In all cases, a party designated to review an appeal will delegate review in any matter in which they cannot serve as an impartial reviewer.

Appeal Timeline: The decision on an appeal will be issued as expeditiously as possible, usually within 45 days, though this may vary based on the scope of the appeal or unforeseen circumstances. A written decision, including the reason for the appeal's resolution, will be provided to the party requesting appeal and the EO within five working days following completion of the appellate review. If appropriate, the EO will promptly communicate any changes to the original findings or sanctions to other involved parties.

Standard of Review: Appellate review is not a de novo hearing. Rather, review is based on the evidence from the investigation and findings or sanctions may be modified upon a finding of "manifest error" (i.e., that the decision or sanction was clearly or obviously wrong) based on the above-listed grounds (i.e., procedural error, new and substantial evidence). The Appellate Reviewer may review the full case and will have access to all information that was available in the investigation, including aspects beyond the investigation as outlined in the request for appeal, but the review will not make independent credibility determinations relative to individuals involved in the underlying investigation. If the Appellate Reviewer does not find that the enumerated grounds for appeal are present in the request for appeal, the original outcome will be upheld. If the Appellate Reviewer finds that any of the grounds for appeal are present in the request for appeal, the Appellate Reviewer may amend the outcome, may issue a new outcome, or may refer the matter back to the investigator for further consideration. A final outcome on an appeal is not subject to further appeal.

In the event sanctions were imposed as part of the original finding, it shall be in the discretion of the Appellate Reviewer whether the sanctions shall be implemented or stayed pending resolution of an appeal. Review of sanctions will apply an "arbitrary or capricious" standard about whether the remedial recommendations were not the product of a reasonable judgment. The Appellate Reviewer will have the authority to adapt the sanction imposed or change the sanction to a lesser or more severe sanction. Appeals results will be delivered simultaneously to Complainants and Respondents.

Informal Resolution Process

Subject to the consent of the parties and the approval of the university's Assistant Provost for Title IX Compliance and Education, the university permits informal resolution processes in cases in which a formal complaint has been filed with the university's Assistant Provost for Title IX Compliance and Education.

Subject to approval by the university's Assistant Provost for Title IX Compliance and Education, the informal resolution process is available in matters involving a student Complainant and a student Respondent as well as in matters involving a faculty/staff Complainant and a faculty/staff Respondent; the informal resolution process is not available in matters involving a student and an employee.

The informal resolution process is a voluntary, remedies-based process designed to provide parties with an option to resolve disputes with other students in a forum that is separate and distinct from the university's formal grievance processes under the Federal Regulation Sexual Harassment policy. The purpose of the informal resolution process is to address the conduct which has been reported by the Complainant and place the parties in a position to pursue their academic and non-academic interests in a safe, respectful and productive educational and working environment. Under this process, there will be no disciplinary action taken against a Respondent, and the resolution will not appear on the Respondent's disciplinary record.

The university may facilitate the informal resolution process prior to conducting a hearing. Before the informal resolution process is used, both parties must provide voluntary, written consent to the informal resolution process and must receive written notice disclosing: the allegations, the requirements of the informal resolution process (including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations) and any outcomes resulting from participating in the informal resolution process (including the records that will be maintained or could be shared). At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the Federal Regulation Sexual Harassment grievance process with respect to the formal complaint. The university will not require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to an investigation and adjudication of formal complaints of Federal Regulation Sexual Harassment. Similarly, the university will not require, encourage, or discourage the parties from participating in the informal resolution process.

All Other Sexual Misconduct Involving Student Respondents

The Tulane University Code of Student Conduct (the Code) describes the procedures followed when a violation is reported to the Office of Student Conduct. These reports are often received through the university's online reporting system <https://tulane.edu/concerns>, filed by Resident Advisors, TUPD officers, general members of the Tulane community, or non-affiliates.

The Code outlines the process and the rights of both the Complainant (the person bringing the complaint) and the Respondent (the student alleged to have violated the Code). Student victims have the right to participate as a Complainant, to participate as a witness or not to participate at all. In cases in which a student victim requests that no action be taken, the University's Sexual Misconduct Response Team reviews the case to assess the ongoing risk to the campus community. Interim measures may be imposed at this time. Both Respondent and Complainant have the right to have an advisor present.

In cases that move forward, the Office of Student Conduct uses an investigative model to process the complaint in a fair, impartial and unbiased manner. In each case a neutral investigator is assigned to do the investigation. These individuals are typically staff members from the Office of Student Conduct. The investigator meets with involved parties, including witnesses, to prepare an investigation report.

The investigation report is sent to both parties simultaneously for comment and review to ensure that relevant information has been gathered and considered. The investigator will make a determination of responsibility and then decide, if the Respondent is found responsible, what the appropriate sanction is

and issues that via report. In all proceedings, the preponderance of the evidence is the appropriate evidentiary standard.

At the conclusion of the formal process, both parties will be notified of the outcome in writing, simultaneously. Both parties will also be informed of the process for appealing that finding. Each party has the right to appeal the finding and sanction to a hearing board consisting of three faculty and/or staff members who have received Title IX training. Any change in finding will be sent to both parties simultaneously.

All Other Faculty & Staff Sexual Misconduct

The Tulane University Equal Opportunity & Anti-Discrimination Policies (EO Policies) describes the procedures followed when an allegation of sexual harassment, sexual assault, intimate partner violence, or stalking committed by an employee is reported. The Equal Opportunity & Resolution Management Department (EO) investigates reports against staff with respect to whether a policy violation occurred. Regarding complaints made against faculty, the EO works with the Faculty Grievance Committee to investigate reports of sexual harassment, sexual assault, intimate partner violence and stalking involving faculty and make factual findings. A preponderance of the evidence standard is applied with respect to whether a policy violation occurred. This process is described in more detail at <https://hr.tulane.edu/equal-opportunity-0>.

Burden of Proof & Standard of Evidence

In all campus disciplinary proceedings, the standard of proof that is applied is a preponderance of the evidence (i.e., more likely than not that the allegation or allegations occurred). The rules of evidence that apply in a court of law do not apply during campus disciplinary proceedings.

Possible Sanctions

Following the determination of responsibility or violation, the university has a range of sanctions available for consideration. The variety of sanction differs based on the individual's status at the university. Below are sanctions that may be considered in cases when the Respondent has been found responsible or in-violation of the university Policy:

Students

Sanctions against Students shall be imposed under the Code of Student Conduct.

If there is a finding of responsibility, the decision maker will consider the scope of the case, impact on students and community and prior history when assigning sanctions. The decision maker will also decide if remedies are appropriate in order to restore or preserve equal access to their education at the university. Such remedies may include the same individualized services described as "Supportive Measures;" however, unlike Supportive Measures, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent. All sanctions must be approved by the Director of Student Conduct and remedies approved by the university Title IX Coordinator. Upon completion, cases will be turned over to the Office of Student Conduct and the Title IX office and any other appropriate administrators for sanction and remedy implementation.

A Respondent in these cases may acknowledge responsibility at any time and accept sanctions imposed by the Office of Student Conduct. A Complainant may withdraw the complaint at any time. Either of these occurrences would cease any investigation.

Sanctions for a finding of responsibility for these cases ranges from a warning to expulsion and may also include a variety of educational sanctions. Supportive measures cannot be used as sanctions. Sanctions include:

1. **Expulsion.** Expulsion means that a student is removed from the university community permanently. The expulsion will be noted on a student's transcript.
2. **Suspension.** Suspension means that a student must leave the university for a definite or indefinite period. A student may eventually return if applicable conditions are satisfied. Suspensions do not appear on a transcript but are part of a student's educational record.
3. **Probation.** Probation means that a student may remain at the university, or an organization may continue to be recognized by the university but may be required to satisfy specified conditions or requirements, or report regularly to a designated administrator. Students may be barred from holding any office. Students or organizations may be barred from participating in any activity in which the student or organization represents the university, including athletics or other competitive teams. Students or organizations may lose their good standing during periods of probation. Students may be barred from participating in any university recognized student organizations either within or outside the university community. The sanction of probation may prohibit graduation until the period of probation has ended and the student has complied with all requirements.
4. **Withholding of Degree.** The university reserves the right to withhold a diploma pending completion of specific requirements.
5. **Educational Requirements.** Completion of projects, programs, or other such requirements designed for student development purposes. This may include a variety of developmental, wellness or restorative programs for both individuals and organizations.
6. **Contact Restrictions.** Compliance with orders of no contact that limit access in time and space to specific university areas, including digital arenas, or forms of contact with particular persons or groups.
7. **Campus, Facility or Housing Restrictions.** Exclusion from the university housing or change in housing arrangements, including relocation.
8. **Community Service.**
9. **Written Warning or Reprimand.** Written warning giving the student or organization notice that any subsequent Code violations may carry more serious sanctions.
10. **Oral Warning or Reprimand.** Oral warning giving the student or organization notice that any subsequent Code violations may carry more serious sanctions.
11. **Consequence Withheld.** In some situations, the imposition of certain consequences may be withheld conditioned upon a student's or organization's compliance with specified requirements.
12. **Loss of Privileges.** For example, in some circumstances a student or organization may be restricted in the use of university facilities or from participation in activities, events or programs.
13. **Restitutions/Fines/Costs.** A student or organization may be required to compensate for damage to tangible or intangible property. In addition, the university reserves the right to impose reasonable monetary fines.
14. **Referrals for Assessment.** The university may require a student to be assessed, seek counseling, or medical intervention.

15. **Revocation of Affiliation.** Revocation of affiliation means that the student will no longer be permitted to be a member of a specific organization or that an organization will no longer be affiliated with the university.
16. **Oral or Written Acknowledgement.** A student or organization may receive an oral or written acknowledgment for good citizenship in following the core values and/or Code rules.
17. **Community Workshops.** This program teaches students how to be a good neighbor.
18. **Community Clean-ups.** This allows students to directly improve the surrounded community by participating in organized clean-up efforts.

Faculty/Staff

Sanctions: EO does not have independent authority to impose sanctions.

- Sanctions against Faculty shall be imposed by applicable university policies as maintained in the Faculty Handbook and in the Bylaws of the university Senate.
- Sanctions against all others shall be imposed under the Staff Handbook. All others may include (though are not limited to) Staff, Administrators, Librarians, Post-Doctoral Candidates, Resident Assistants, Graduate Teaching Assistants and other Student-employees and faculty on appointments of less than a year or on the first year of appointment.

Sanctions imposed on individuals who have violated the Equal Opportunity/Anti-Discrimination Policies will be commensurate with the severity and/or frequency of the conduct and shall be adequate and sufficient to prevent such conduct in the future. Sanctions may include, but are not limited to, an apology to the Complainant; a verbal or written reprimand; a requirement to attend remedial discrimination and harassment training; appropriate workplace restrictions; no contact orders; denial of a merit pay increase or other benefit; denial of promotion; or reassignment, demotion, suspension or separation from the university.

Additional Information on Disciplinary Proceedings

The investigation of Title IX Sexual Harassment matters is dictated by the May 2020 Amendments to the Title IX Federal Regulations (34 C.F.R. part 106) and rests on the process described in the Code as well as the additional procedural requirements outlined here. The university is committed to providing a fair, prompt and impartial investigation and adjudication of all Formal Complaints alleging violations of this policy or of any incident of sexual misconduct (dating violence, domestic violence, sexual assault, stalking or incest). During the Grievance Process, both parties (Complainant and Respondent) have equal rights to participate.

The disciplinary proceedings will be conducted in a manner that is consistent to university policy and transparent to the Complainant and Respondent. Timely notices of meetings will be given at which the Complainant, Respondent, or other witnesses, may be present. The university will provide timely and equal access to the Complainant, the Respondent, and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.

The disciplinary proceedings will be conducted by officials who do not have a conflict of interest or bias for or against the Complainant or the Respondent.

For purposes of this policy, an Advisor means any individual who provides the Complainant or Respondent support, guidance, or advice. A proceeding under this policy means all activities related to a non-criminal resolution of a disciplinary complaint, including, but not limited to, fact-finding investigations, formal or

informal meetings, and hearings. A proceeding does not include communications and meetings between officials and victims concerning supportive measures, accommodations, or protective measures to be provided to a victim.

Result means any initial, interim and final decision by any official or entity authorized to resolve disciplinary matters within the university. The result includes any sanctions imposed by the university. Notwithstanding section 444 of the General Education Provisions Act (20 U.S.C 1232g), commonly referred to as the Family Educational Rights and Privacy Act (FERPA), the result must also include the rationale for the result and the sanctions.

Compliance with the above policy and procedures does not constitute a violation of FERPA.

The institution will, upon written request, 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 such institution 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 this paragraph.

Assistance for Victims – Rights & Options

Regardless of whether a student or employee victim elects to pursue a criminal complaint or whether the offense is alleged to have occurred on or off campus, the university will assist victims of sexual assault, domestic violence, dating violence, and stalking and will provide each victim with a written explanation of their rights and options.

Such written information will include:

- The procedures victims should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred;
- Information about how the institution will protect the confidentiality of victims and other necessary parties;
- A statement that the institution will provide written notification to students and employees about victim services in the institution and in the community;
- A statement regarding the institution's provisions about options for, available assistance in, and how to request accommodations and protective measures; and
- An explanation of the procedures for institutional disciplinary action.

Accommodations and Protective Measures Available for Employee Victims

When an employee reports to Tulane University that they have been the victim of sexual misconduct (dating violence, domestic violence, sexual assault, stalking or incest), regardless of whether the offense occurred on or off campus, Tulane will provide the reporting person with a written explanation of their rights and options. The university takes all concerns of sexual misconduct very seriously and is committed to maintaining a campus environment where all individuals are treated equally and with respect and dignity.

Victims are encouraged to report to law enforcement and to participate in the university's internal reporting process but are not obligated to do so. The resources, support, and protective measures described below are available even if a victim decides not to participate in university or law enforcement processes.

- Assistance in obtaining counseling, healthcare, mental healthcare, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other service.
- Change in work situation, such as relocation to provide a more private or secure location, additional security measures, etc.
- No contact instructions (to instruct the Respondent to stop all attempts at communication or other interaction).
- Change in transportation arrangements, such as parking in a different location.
- Assistance in reporting to on- or off-campus law enforcement or in initiating university disciplinary proceedings.
- Change in on-campus living arrangements, such as changing floors or residence halls, if applicable

Accommodations and Protective Measures Available for Student Victims

Supportive Measures

Supportive Measures are individualized services offered to Complainants and Respondents that are offered as appropriate and reasonably available to restore or preserve equal access to Tulane University's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or Tulane's educational environment, or deter Sexual Harassment. Supportive Measures are available regardless of whether a Complainant wants to move forward with a Formal Complaint.

When the university has notice of potential Title IX Sexual Harassment, or any other form of sexual misconduct (dating violence, domestic violence, sexual assault, stalking or incest), the university will inform the Complainant of the availability of Supportive Measures with or without the filing of a Formal Complaint and explain to the Complainant the process for filing a Formal Complaint.

Supportive Measures are non-disciplinary, non-punitive individualized measures offered as appropriate, as reasonably available and without fee or charge to the Complainant or Respondent. They may include:

- Access to counseling services and assistance in setting up initial appointments, both on and off campus.
- Imposition of mutual Contact Restriction, also known as a No Contact Order.
- Rescheduling of exams and assignments.
- Providing alternative course completion options.
- Change in class schedule, including the ability to drop a course without penalty or to transfer sections.
- Change in on-campus work schedule or job assignment.
- Change in student's campus housing, as reasonably available.
- Assistance from university support staff in exploring alternative housing options.
- Access modifications to certain university facilities or activities pending resolution of the matter.
- Voluntary leave of absence.
- Providing an escort to assure safe movement on-campus between classes and activities.
- Arranging for medical services.
- Providing academic support services, such as tutoring.

The university will consider a number of factors in determining which Supportive Measures to take, including the needs of the student seeking Supportive Measures; the severity or pervasiveness of the alleged conduct; any continuing effects on the Complainant; whether the Complainant and the

Respondent share the same residence hall, academic course(s) or on-campus job location(s); and whether judicial measures have been taken to protect the Complainant (e.g., protective orders). The university will work in good faith to implement the requirements of judicially issued protective orders and similar orders, to the extent that doing so is within its authority. The office of Student Affairs retains the authority to issue mutual contact restrictions which is a formal notice that principles to an investigation are prohibited from any type of interaction with each other over the course of the investigation. Violations of mutual contact restrictions may result in progressive university disciplinary action up to and including expulsion.

The Title IX Coordinator has designated the office of Case Management & Victim Support Services (CMVSS) within the Division of Student Affairs to administer the offer and implementation of Supportive Measures for student Complainants and Respondents.

The Title IX Coordinator is responsible for ensuring the implementation of Supportive Measures. To that end, if a student feels as though they have been denied a reasonable Supportive Measure by CMVSS, they may file an appeal with the Title IX Coordinator.

The university will maintain the privacy of any Supportive Measures provided under this Appendix to the extent practicable and will promptly address any violation of protective measures.

The process for offering and implementing Supportive Measures to students and related other individuals is as follows:

Complainants. Upon receipt of a student disclosure of sexual misconduct, regardless of whether it falls within Title IX, CMVSS will promptly contact the Complainant and invite them to speak with a case manager to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the Complainant the process for filing a formal complaint. Complainants who either wish to or file a formal complaint with the university but have their complaints dismissed because of one of the reasons explained in the Dismissal section may be able to pursue conduct action through the Code of Student Conduct or Equal Opportunity & Anti-Discrimination Policy; Complainants will be informed of that option, as well as their option to appeal a complaint's dismissal. In addition to an in-person meeting, the university will provide the Complainant with written information about resources, procedural options, and reasonably available Supportive Measures. This written information shall include a notification about the process for seeking disability-based accommodations, academic adjustments and/or auxiliary aids under Section 504 of the Rehabilitation Act and/or the Americans with Disabilities Act.

Respondents. Once a student has been named in a formal complaint and/or received notice that they are a Respondent in a Title IX matter, CMVSS will contact the Respondent and invite them to speak with a case manager to learn about supportive measures available and the Title IX grievance procedure.

Third Parties. The university will also provide Supportive Measures for Third Parties, provided that the Supportive Measures are within the scope of that individual's relationship to the university and are reasonably available.

Emergency Removal

Based on the information in a Report, or information subsequently learned, the university may remove a Respondent from the university's education program or activity (including placing a non-student employee Respondent on administrative leave during the grievance process) on an emergency basis.

An Emergency Removal requires that the university undertake an individualized safety and risk analysis and then determine if a removal is warranted due to an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Sexual Harassment. This analysis will be conducted by the university's Behavioral Intervention Team with a final determination regarding removal made by a Deputy Title IX Coordinator (either the Deputy for Students or Deputy for Employees, depending on the Respondent's identity). The Respondent will be notified in writing as to the determination and reasoning for the removal decision; this notice will also detail how the Respondent can choose to file an appeal immediately following the removal. All emergency removal appeals will be heard by the Title IX Coordinator within 36 hours of submission and a decision returned in writing to the Respondent.

If the removal directly relates to the Complainant, the Complainant will be notified if a Respondent has been subjected to an Emergency Removal and the outcome of any appeals the Respondent files to challenge their removal. If the Respondent files an appeal to a removal decision, the Complainant will have 24 hours to provide information for consideration of the appeal. Removals will be re-evaluated on a weekly basis by the Behavioral Intervention Team.

Prohibition on Retaliation

The university prohibits any retaliation, intimidation, threat, coercion, or otherwise discriminate act by any university official, employee, staff or faculty member or student against any individual for exercising their rights or responsibilities under this policy.

In addition to the prohibition on Retaliation found in the Code of Student Conduct, neither the university nor any person may intimidate, threaten, coerce or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the individual has made a Report or Formal Complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding or hearing under this part. Intimidation, threats, coercion or discrimination for the purpose of interfering with any right or privilege secured by Title IX, constitutes retaliation. This includes charges against an individual for other conduct violations that do not involve sex discrimination or Sexual Harassment but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a Report or Formal Complaint of Sexual Harassment.

Notification of Victims of Crimes of Violence

In accordance with the Higher Education Opportunity Act (HEOA), the College will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense the report on the results of any disciplinary proceeding conducted by the College against a student or employee who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as the result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Risk Reduction for Potential Victims

Recognizing abusers are solely responsible for their abuse and no victim of a crime is to blame for the perpetration of the crime, the following are some strategies to reduce risks commonly related to sexual assault or harassment (adapted from **Rape, Abuse, & Incest National Network**, www.rainn.org).

- **Be aware of your surroundings.** Knowing where you are and who is around you may help you to recognize a threatening situation and avoid it.
- **Try to avoid isolated areas.** It is more difficult to get help if no one is around.
- **Walk with purpose.** Even if you don't know where you are going, act like you do.
- **Trust your instincts.** If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- **Try not to load yourself down with packages or bags** as this can make you appear more vulnerable.
- **Make sure your cell phone is with you** and charged and that you have cab money and/or an on-demand driver app loaded.
- **Try to avoid becoming isolated with someone you don't trust** or someone you don't know.
- **Avoid putting headphones** in both ears so that you can be more aware of your surroundings, especially if you are walking alone.
- **Attend social gatherings with a group of friends.** Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- **Don't leave your drink unattended** while talking, dancing, using the restroom or making a phone call. If you've left your drink alone, just get a new one.
- **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with the person to the bar to order it, watch it being poured and carry it yourself. At parties, don't drink from punch bowls or other large, common open containers.
- **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had or is acting out of character, get them to a safe place immediately.
- **If you suspect you or a friend has been drugged,** contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

If you need to get out of an uncomfortable or scary situation, here are some things that you can try:

- **Remember that being in this situation is not your fault.** You did not do anything wrong; it is the person who is making you uncomfortable that is to blame.
- **Be true to yourself.** Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
- **Have a code word** with your friends or family so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
- **Lie.** If you don't want to hurt the person's feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
- **Try to think of an escape route.** How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
- **If you and/or the other person have been drinking,** you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

Risk Reduction for Potential Perpetrators

- Familiarize yourself with the university's definition of consent and laws regarding consent. Always ensure you ask for and obtain consent for any sexual interactions.
- Learn about healthy relationships and engage in respectful and healthy communication in all relationships.
- Avoid overconsuming alcohol or drugs, which can lower inhibitions. Learn about sexual health and literacy and engage in healthy sexual practices.
- Respect the boundaries that others set.
- Communicate with romantic partners regarding acceptable behavior and acts before initiating such acts.

Risk Reduction for Potential Bystanders

- Take a One Wave bystander intervention workshop to learn about and practice strategies for intervening in potential moments of harm.
- If you witness a potential moment of harm, check in directly with the potential victim to see if they need support.
- If you witness a potential moment of harm, ask the potential perpetrator to stop their behavior.
- Create a distraction to disrupt a potential moment of harm.
- Report an incident to someone with the authority to intervene and/or other support to impacted parties.
- Speak up when you hear others using inappropriate language or overstepping a boundary.
- Check in individuals who appear to be incapacitated and help them get home safely and/or seek medical attention.
- Model respect and consent in all of your interactions.

Sex Offender Registration and Access to Related Information

Section 121 of the Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C. 16921) provides for the registration and tracking of sex offenders. Institutions of higher education are required to issue a statement advising the campus community of where to obtain law enforcement agency information provided by a state concerning registered sex offenders. The law also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation or is a student.

In the state of Louisiana, members of the public may request community notification flyers for information concerning sexually violent predators in a particular community by visiting the Chief Law Enforcement Officer of that Louisiana Parish. A listing of registered sex offenders is available on the state of Louisiana's website for registered sex offenders at <https://www.lsp.org/community-outreach/sex-offender-registry/>. The links to the sex offender registry for Louisiana is on the Tulane University Police Department (TUPD) website at <https://publicsafety.tulane.edu>.

Additionally, upon request, the institution will disclose the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of any crime of violence or a non-forcible sex offense (incest or statutory rape) to the alleged victim or next of kin if the victim is deceased. Please contact the TUPD to facilitate this process.

CAMPUS SECURITY POLICIES, CRIME PREVENTION & SAFETY AWARENESS PROGRAMS

Missing Student Notification Policy and Procedures

In accordance with the Higher Education Opportunity Act (HEOA), the College must develop and implement certain procedures to be followed when on-campus residential students are determined to be missing for 24 hours.

Tulane has adopted a missing student notification policy for students residing in university owned and controlled (leased or rented) residential facilities as well as privately owned fraternity houses officially recognized by the University (this includes residential facilities in both the on-campus and non-campus Clery geography categories). In addition to registering a general emergency contact, all students residing in student housing facilities must annually register confidential contact information for a person to be notified by the University in the event the student is reported as missing. Students are able to update the confidential contact information annually during the housing application process. Information on these procedures and the registration process is provided to students during the housing registration period prior to each academic year. The contact information will be confidential, accessible only by authorized campus officials and law enforcement, and may not be disclosed outside a missing person investigation. Tulane will notify that individual no later than 24 hours after the student is determined to be missing.

Provisions

It will be made clear to all students annually that each residential student of the University has the option to designate an individual to be contacted by Tulane University administration no later than 24 hours after the time that Tulane University determines the student is missing. During the housing application process, Tulane University provides students with the option to register confidential Missing Student contact information. This information is only accessible to university employees who are authorized campus officials, and this information will not be disclosed to others with the exception to law enforcement personnel in the furtherance of a missing student investigation. In accordance with the university's Missing Student Policy, it should be noted that the university notifies each student who is under 18 years of age (and not an emancipated individual) that the university is required to contact the student's parents or guardian in addition to the person identified as the missing student contact person. This contact will be made no later than 24 hours after the time that the student is determined to be missing.

In accordance with university procedures, it should be noted that the university will inform each residential student that the university will notify the appropriate local law enforcement agency, when a student has gone missing, unless the local law enforcement agency was the entity that made the determination that the student was missing. This notification will be made no later than 24 hours after the time that the student is determined missing.

If the campus law enforcement personnel have been notified that a student has gone missing and decides that a student who is the subject of a missing person report has been missing for more than 24 hours, university staff will initiate emergency contact procedures as outlined in the university's policy and protocol.

If any member of the Tulane community has reason to believe that a student who resides in on-campus housing or non-campus housing is missing for more than 24 hours, they should call TUPD at 504-865-5911 (or simply 55911 from a campus phone) uptown and 504-988-5555 (or simply 85555 from a campus phone) downtown. The Tulane community is encouraged to make any missing student reports directly to TUPD, particularly if there is reason to believe someone's safety is at risk. A secondary method to report a

missing student is to complete the online report form at <https://tulane.edu/concerns>. When an immediate response is necessary, reports should be made directly to TUPD.

Below are the university's missing student investigative procedures including communication procedures for official notification of appropriate individuals at the university that a student has been missing for more than 24 hours.

- An official Missing Person Report is to be filed relating to a university residential student to be referred immediately to the university police.
- If through investigation of an official report, the university police determines a student has been missing for more than 24 hours, they will:
 - Notify the local police.
 - Contact those individuals provided by the student, as their Missing Student contact person. This information is maintained by the Department of Housing and Residence Life and available to TUPD.
 - If a student is under 18 years of age, and not an emancipated individual, immediately contact the custodial parent(s) or legal guardian(s) of the student, in addition to the student's Missing Student contact person.

Daily Crime and Fire Log

TUPD combines its Daily Crime Log and Fire Log into one public document. TUPD makes the Daily Crime and Fire Logs for the most recent 60-day period open to public inspection during normal business hours (typically Monday through Friday, from 8 a.m. to 5 p.m., except holidays) at the uptown and downtown TUPD stations and the Tulane National Primate Research Center. Any portion of these crime and fire logs that are older than 60 days are made available for public inspection within two business days of a request. All confirmed fires occurring within or on any and all on-campus residential facilities will also be included in the Daily Crime and Fire Log. The information in the crime and fire log typically includes the incident number, crime classification or nature of the fire, date reported, date occurred, general location of the crime or fire and disposition of each reported crime or fire. Faculty, staff and students are encouraged to review these logs periodically to become more familiar with the types and locations of criminal incidents and fires that may impact the campus community. The names of crime victims will not be listed on the Daily Crime and Fire Log.

Unless the disclosure is prohibited by law or would jeopardize the confidentiality of the victim, newly reported crimes/ incidents within the Tulane's Clery geography/TUPD patrol jurisdiction and updated information regarding previously reported crimes are entered onto the Daily Crime and Fire Log within two business days of when it is reported to TUPD.

In addition to being available for in-person viewing, the Daily Crime and Fire log are available on the TUPD website: <https://publicsafety.tulane.edu/daily-crime-log>.

Crime Prevention and Safety Awareness Programs

In an effort to promote safety awareness, the TUPD maintains a strong working relationship with the community. This relationship includes offering a variety of safety and security programs and services and crime prevention programming. TUPD officers maintain regular communication with the Division of Student Affairs, that includes the Office of Student Resources and Support Services, Housing and Residential Life and Campus Health/ The Well for Health Promotion, to share information and strategies in the best interests of students and the community. Below are some of the programs and services offered at Tulane University.

New Student Online Courses

- All students who are new to Tulane (first-year and transfer students) are required to complete a series of online health promotion courses.
- Alcohol and Other Drugs is an interactive learning experience that equips students with the skills to support healthy decisions for themselves and their peers, reducing adverse outcomes associated with alcohol and other drug misuse.
- Sexual Misconduct Prevention is a comprehensive simulation that equips college students with the skills to navigate difficult situations related to sexual misconduct, leading to a safer and more connected campus.
- Additionally, Campus Health will offer an optional fourth course, Sexual Health for Students and Sexual Literacy for Students.

The Sexual Health for Students and Sexual Literacy for Students

The Sexual Health for Students and Sexual Literacy for Students offers Tulane University students an opportunity to develop their own concept of healthy sexuality. The curriculum provides medically accurate and sex positive comprehensive sexual health education through interactive modules. Topics covered in the modules include consent and healthy relationships; adolescent development; sexual and reproductive anatomy and physiology; gender identity and expression; sexual identity and orientation; interpersonal and sexual violence; contraception, pregnancy and reproduction; and HIV and other STDs/STIs. This program is sponsored by The Well for Health Promotion, a department within Campus Health, and is available on-demand to any student.

Mardi Gras Kickoff

The annual Mardi Gras Kickoff program provides Tulane University students with the information and skills necessary for promoting safer choices during Mardi Gras and other festivals. This program provides tips for safe transportation during Mardi Gras, delivers concrete steps students can take to intervene and prevent violence, offers harm reduction strategies to reduce negative consequences related to alcohol misuse, and explains how to respond to alcohol overdose or a medical emergency. This program is sponsored by the Well for Health Promotion.

Sexual Assault Awareness Month

Every April, Tulane University honors Sexual Assault Awareness Month with a variety of events that focus on violence prevention and aim to create a safer Tulane. This is sponsored by The Well for Health Promotion and Tulane's Title IX Office.

All In: Understanding and Preventing Sexual Violence at Tulane

All In: Understanding and Preventing Sexual Violence at Tulane University is a peer-led annual workshop for all incoming students that explores what sexual violence is, how to prevent it and what to do if a friend or peer is a victim.

TULANE UNIVERSITY POLICIES GOVERNING ALCOHOL AND OTHER DRUGS

Tulane University is committed to cultivating an environment that focuses on learning, service to the community, and personal development. The Tulane Alcohol and Drug policy is intended to further the mission of the university. The university recognizes that each member of our community is responsible for their actions. At the same time, the health and well-being of our community is a shared responsibility. Each year, excessive alcohol and drug use impacts college students, as well as college communities and families.

Alcohol-Related Health Impacts:

An estimated 95,000 people (approximately 68,000 men and 27,000 women) die from alcohol-related causes annually, making alcohol the third-leading preventable cause of death in the United States.

Consequences of Underage Alcohol Use:

Research indicates that alcohol use during the teenage years can interfere with normal adolescent brain development and increase the risk of developing alcohol use disorder. In addition, underage drinking contributes to a range of acute consequences, such as injuries, sexual assaults, alcohol overdoses and deaths—including those from motor vehicle crashes.

Prevalence of Alcohol Use**Prevalence of Drinking:**

According to the 2019 NSDUH, 47.1 percent of adults ages 18 to 22 drank alcohol in the past month. Within this age group, 52.5 percent of full-time college students ages 18 to 22 and 44 percent of other persons of the same age drank alcohol in the past month.

Prevalence of Binge Drinking:

According to the 2019 NSDUH, 29.6 percent of adults ages 18 to 22 reported binge drinking in the past month. Within this age group, 33.0 percent of full-time college students ages 18 to 22 and 27.7 percent of other persons of the same age reported binge drinking in the past month.

Prevalence of Heavy Drinking: According to the 2019 NSDUH, 7.0 percent of adults ages 18 to 22 and 8.2 percent of full-time college students ages 18 to 22 and 6.4 percent of other persons of the same age reported heavy alcohol use in the past month.

Alcohol is a factor in the deaths of thousands of people ages 18 to 22 every year in the United States. The most recent NIAAA statistics estimate that this includes 1,519 college students ages 18 to 24 who die from alcohol-related unintentional injuries, including motor vehicle crashes.

Policy

Tulane University adheres to the provisions of the Drug Free Schools and Communities Act, Part 86. Tulane annually distributes to students, staff and faculty information that includes the university Alcohol and Drug Policies, counseling and assistance programs, university and legal sanctions, health risks and uses and effects of controlled substances.

The university encourages moderation in the use of alcohol for members of the community who are of legal age and choose to drink. The university believes that choosing not to drink is as socially acceptable as choosing to drink.

This policy and all related policies and protocols can be found online at <https://campushealth.tulane.edu/alcohol/policies-rules-response>.

I. Policy Statement**Alcohol Philosophy**

Every member of the Tulane University community is expected to make responsible choices regarding alcohol and other drugs. The misuse or abuse of these substances can result in detrimental consequences for individuals and those around them. At Tulane, we expect our community members to cultivate a

healthy and safe educational environment that supports each student to reach their full academic potential.

The university approaches alcohol and other drug use with the following beliefs in mind:

- We value the health and well-being of every member of our community and respect an individual's choice to legally consume alcohol or to abstain from alcohol use.
- All members of our community have a responsibility to foster an environment where responsible choices regarding alcohol and other drugs are the norm.
- An individual's choices and behaviors impact our community; Tulanians are accountable for their actions if they compromise the health and safety of themselves or others.
- We support individuals who are struggling with alcohol or other drug misuse, abuse or addiction through intervention, education and treatment.

II. Reason for Policy

Tulane University will comply with and uphold all federal, state and local laws that regulate or prohibit possession, use or distribution of alcoholic beverages or illicit drugs. In addition, Tulane has policies and procedures to ensure the misuse or abuse of these substances is not tolerated. Finally, the university has the obligation to follow up with any student involved in an alcohol and drug related policy violation or medical emergency.

Louisiana Laws Regarding the Purchase, Possession and Use of Alcoholic Beverages

The following is a summary of certain Louisiana laws regarding the purchase, possession and use of alcoholic beverages and other illegal drugs:

- It is unlawful to falsify a driver's license or other identification document to obtain or attempt to obtain any alcoholic beverages or to permit someone else to use one's driver's license or other identification document to obtain or attempt to obtain any alcoholic beverages or for the purposes of entering a premise licensed to sell alcohol. La. Rev. Stat. 14:333. Whoever violates the provisions of this Section shall be punishable by one or more of the following: (1) A fine of not more than \$200, (2) An appropriate amount of community service not to exceed 30 hours and/or (3) Suspension of the violator's driver's license for 90 days.
- It is unlawful to falsify a driver's license or other identification document to obtain or attempt to obtain any alcoholic beverages or to permit someone else to use one's driver's license or other identification document to obtain or attempt to obtain any alcoholic beverages or for the purposes of entering a premise licensed to sell alcohol. La. Rev. Stat. 14:333. Whoever violates the provisions of this Section shall be punishable by one or more of the following: (1) A fine of not more than \$200, (2) An appropriate amount of community service not to exceed 30 hours and/or (3) Suspension of the violator's driver's license for 90 days.
- It is unlawful for any person under the age of 21 to purchase or publicly possess any alcoholic beverages. La. Rev. Stat. 14.93.12. Public possession means "possession of any alcoholic beverage for any reason, including consumption, on any street, highway, waterway or in any public place or any place open to the public including a club which is de facto open to the public." La. Revs. Stat. 14.93.10. Whoever violates the provisions of this Section shall be fined not more than \$100 and the driver's license of any person violating the provisions of this Section may be suspended upon conviction, plea of guilty or nolo contendere for a period of 180 days.
- It is unlawful for any person, other than a parent, spouse or legal guardian, to purchase on behalf of a person under 21 any alcoholic beverages. La. Rev. Stat. 14.93.13. Whoever violates the provisions of this Section shall be fined not more than \$500 or imprisoned for not more than 30

days, or both and the driver's license of any person violating the provisions of this Section may be suspended upon conviction, plea of guilty, or nolo contendere for a period of 180 days.

- It is unlawful to sell alcoholic beverages to any person under 21. La. Rev. Stat. 14.93.11. Whoever violates the provisions of this Section shall be fined not less than \$500 nor more than \$1000 or imprisoned for not less than 30 days nor more than six months, or both.
- It is unlawful for a person under 21 to drive under the influence when the operator's blood alcohol concentration is .02 or more. La. Rev. Stat. 14.98.6.
- It is unlawful for any person under the age of 21 to purchase or publicly possess any alcoholic beverages. La. Rev. Stat. 14.93.12. Public possession means "possession of any alcoholic beverage for any reason, including consumption, on any street, highway, waterway or in any public place or any place open to the public including a club which is de facto open to the public." La. Revs. Stat. 14.93.10. Whoever violates the provisions of this Section shall be fined not more than \$100 and the driver's license of any person violating the provisions of this Section may be suspended upon conviction, plea of guilty or nolo contendere for a period of 180 days.
- It is unlawful for any person, other than a parent, spouse or legal guardian, to purchase on behalf of a person under 21 any alcoholic beverages. La. Rev. Stat. 14.93.13. Whoever violates the provisions of this Section shall be fined not more than \$500 or imprisoned for not more than 30 days, or both and the driver's license of any person violating the provisions of this Section may be suspended upon conviction, plea of guilty, or nolo contendere for a period of 180 days.
- It is unlawful to sell alcoholic beverages to any person under 21. La. Rev. Stat. 14.93.11. Whoever violates the provisions of this Section shall be fined not less than \$500 nor more than \$1000 or imprisoned for not less than 30 days nor more than six months, or both.
- It is unlawful for a person under 21 to drive under the influence when the operator's blood alcohol concentration is .02 or more. La. Rev. Stat. 14.98.6.

On a first conviction, the offender shall be fined no less than \$100 nor more than \$250 and imprisoned for not less than ten days nor more than three months. Imposition or execution of sentence shall not be suspended unless the offender is placed on probation with the minimum conditions that he/she: (a) Perform 32 hours of court-approved community service activities, at least half of which shall consist of participation in a litter abatement or collection program and (b) Participate in a court-approved substance abuse and driver improvement program. The court may require that the offender not operate a motor vehicle during the period of probation unless any vehicle, while being operated by the offender, is equipped with a functioning ignition interlock device.

On a second or subsequent conviction, regardless of whether the second offense occurred before or after the first conviction, the offender shall be fined not less than \$250 nor more than \$500, and imprisoned for not less than 30 days nor more than six months. Imposition or execution of sentence under this Paragraph shall not be suspended unless the offender is placed on probation with the minimum conditions that he/she: (a) Serve 48 hours in jail without benefit of parole, probation, or suspension of sentence, or in lieu thereof, perform no less than 80 hours of court-approved community service activities, at least half of which shall consist of participation in a litter abatement or collection program, (b) Participate in a court-approved substance abuse program, and (c) Participate in a court-approved driver improvement program. The court may require that the offender not operate a motor vehicle during the period of probation unless any vehicle, while being operated by the offender, is equipped with a functioning ignition interlock device.

- It is unlawful to operate a vehicle while intoxicated when the operator's blood alcohol concentration is .08 percent or more when 21 years of age or older, the operator is under the influence of any controlled

dangerous substance listed in Schedule I, II, III, IV, or V as set forth in R.S. 40:964 La., or the operator is under the influence of a combination of alcohol and one or more drugs that are not controlled dangerous substances and that are legally obtainable with or without a prescription Rev. Stat. 14:98.

On a **conviction of a first offense**, the offender shall be fined not less than \$300 nor more than \$1,000, and shall be imprisoned for not less than ten days nor more than six months. Imposition or execution of sentence under this Paragraph shall not be suspended unless the offender is placed on probation with the minimum conditions that he/she complete all of the following:

(1) (a) Serve 48 hours in jail, which shall not be suspended, or in lieu thereof, perform no less than 32 hours of court-approved community service activities, at least half of which shall consist of participation in a litter abatement or collection program.

(b) Participate in a court-approved substance abuse program, which may include an assessment by a licensed clinician to determine if the offender has a diagnosis of substance abuse disorder. Nothing herein shall prohibit the court from modifying the portions of the program as may be applicable and appropriate to an individual offender as shown by the assessment.

(c) Participate in a court-approved driver improvement program.

(d) Except as provided by Subparagraph (3)(c) of this Subsection, the court shall order that the offender not operate a motor vehicle during the period of probation, for no less than six months, unless any vehicle, while being operated by the offender, is equipped with a functioning ignition interlock device in compliance with the requirements of R.S. 14:98.5(C) and R.S. 32:378.2.

(2)(a) If the offender had a blood alcohol concentration of 0.15 percent or more but less than 0.20 percent by weight based on grams of alcohol per 100 cubic centimeters of blood, at least 48 hours of the sentence imposed pursuant to Paragraph (1) of this Subsection shall be served without the benefit of parole, probation or suspension of sentence, and is to be served in addition to any sentence of imprisonment imposed pursuant to Subparagraph (1)(a) of this Subsection, provided that the total period of imprisonment upon conviction of the offense, including imprisonment for default in payment of a fine or costs, shall not exceed six months.

(b) In addition to any penalties imposed under this Section and except as provided in R.S. 32:414(A)(1)(d) or 667(H)(1)(b), upon conviction of a first offense, if the offender had a blood alcohol concentration of 0.15 percent or more by weight based on grams of alcohol per 100 cubic centimeters of blood, the driver's license of the offender shall be suspended for two years.

(3)(a) If the offender had a blood alcohol concentration of 0.20 percent or more by weight based on grams of alcohol per 100 cubic centimeters of blood, the offender shall be fined not less than \$750 nor more than \$1,000 and at least 48 hours of the sentence imposed pursuant to Paragraph (1) of this Subsection shall be served without the benefit of parole, probation or suspension of sentence, and is to be served in addition to any sentence of imprisonment imposed pursuant to Subparagraph (1)(a) of this Subsection, provided that the total period of imprisonment upon conviction of the offense, including imprisonment for default in payment of a fine or costs, shall not exceed six months.

(b) In addition to any penalties imposed under this Section and except as provided in R.S. 32:414(A)(1)(d) or 667(H)(1)(b), upon conviction of a first offense, if the offender had a blood alcohol concentration of 0.15 percent or more by weight based on grams of alcohol per 100 cubic centimeters of blood, the driver's license of the offender shall be suspended for two years.

(c) The court shall require that the offender not operate a motor vehicle during the period of probation unless any vehicle, while being operated by the offender, is equipped with a functioning ignition interlock device in compliance with the requirements of R.S. 14:98.5(C) and R.S. 32:378.2. The ignition interlock device shall remain installed and operative on his vehicle during the period of suspension of his driver's license following the date of conviction.

Louisiana Laws Regarding the Unauthorized Possession, Use or Distribution of Controlled Substances or Other Illegal Drugs

- **Marijuana Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule I unless such substance was obtained directly, or pursuant to a valid prescription or order, from a practitioner or as provided in R.S. 40:978, while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. On a first conviction or any subsequent conviction, wherein the offender possesses fourteen grams or less, the offender shall be fined not more than \$100. On a first conviction, wherein the offender possesses more than 14 grams, the offender shall be fined not more than \$500, imprisoned in the parish jail for not more than six months, or both. (La R.S. 40:966).
- **Marijuana Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense, a controlled dangerous substance or controlled substance analogue classified in Schedule I; to create, distribute or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule I; or to cultivate, possess, process or sell industrial hemp, industrial hemp products, or viable industrial hemp seeds not in accordance with the U.S. Agriculture Improvement Act of 2018 or the plan submitted by the Department of Agriculture and Forestry that is in compliance with U.S. Department of Agriculture rules. Upon conviction for an amount of: (a) An aggregate weight of less than two and one half pounds, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years, and pay a fine of not more than \$50,000. (b) An aggregate weight of two and one half pounds or more, shall be imprisoned at hard labor for not less than one year nor more than 20 years and pay a fine of not more than \$50,000. (La R.S. 40:966).
- **Synthetic Marijuana Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule I unless such substance was obtained directly, or pursuant to a valid prescription or order, from a practitioner or as provided in R.S. 40:978, while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. A substance classified in Schedule I which is a synthetic cannabinoid, the offender shall be punished as follows: (a) On a first conviction, the offender shall be fined not more than \$500, imprisoned for not more than six months, or both. (b) On a second conviction, the offender shall be fined not less than \$250 nor more than \$2,000, imprisoned with or without hard labor for not more than five years, or both. (c) On a third or subsequent conviction, the offender shall be sentenced to imprisonment at hard labor for not more than 20 years, and may, in addition, be fined not more than \$5,000 (La R.S. 40:966).
- **Synthetic Marijuana Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense, a controlled dangerous substance or controlled substance analogue classified in Schedule I; to create, distribute or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule I; or to cultivate, possess, process or sell industrial hemp, industrial hemp products or viable industrial hemp seeds not in accordance with the U.S. Agriculture Improvement Act of 2018 or the plan submitted by the Department of Agriculture and Forestry that is in compliance with U.S. Department of Agriculture rules. Upon conviction for an amount of: (a) An aggregate weight of less than two-and-one-half pounds, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years, and pay a fine of not more than \$50,000. (b) An aggregate weight of two-and-one-half pounds or more, shall be imprisoned at hard labor for not less than one year nor more than 20 years and pay a fine of not more than \$50,000. (La R.S. 40:966).

- **Heroin Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule I unless such substance was obtained directly, or pursuant to a valid prescription or order, from a practitioner or as provided in R.S. 40:978, while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. A substance classified in Schedule I that is the narcotic drug heroin or a mixture or substance containing a detectable amount of heroin or of its analogues, upon conviction for an amount: (a) An aggregate weight of less than two grams, shall be sentenced to a term of imprisonment, with or without hard labor, for not less than two years nor more than four years. (b) An aggregate weight of two grams or more but less than 28 grams, shall be sentenced to a term of imprisonment, with or without hard labor, for not less than two years nor more than ten years and may, in addition be required to pay a fine of not more than \$5,000. (La R.S. 40:966).
- **Heroin Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute, or dispense, a controlled dangerous substance or controlled substance analogue classified in Schedule; to create, distribute or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule I; or to cultivate, possess, process or sell industrial hemp, industrial hemp products, or viable industrial hemp seeds not in accordance with the U.S. Agriculture Improvement Act of 2018 or the plan submitted by the Department of Agriculture and Forestry that is in compliance with U.S. Department of Agriculture rules. A substance classified in Schedule I that is the narcotic drug heroin or a mixture or substance containing a detectable amount of heroin or its analogues, upon conviction for any amount, shall be imprisoned at hard labor for not less than five years nor more than 40 years and may, in addition, be required to pay a fine of not more than \$50,000.

If the offender unlawfully distributes or dispenses heroin or a mixture or substance containing a detectable amount of heroin or its analogues, which is the direct cause of serious bodily injury to the person who ingested or consumed the substance, the offense shall be classified as a crime of violence, and the offender shall be imprisoned at hard labor for not less than five years nor more than 40 years. At least five years of the sentence of imprisonment shall be imposed without benefit of probation, parole or suspension of sentence. In addition, the offender may be required to pay a fine of not more than \$50,000. (La R.S. 40:966).

- **Ecstasy (MDMA), Hallucinogens, and Phencyclidine Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule I unless such substance was obtained directly, or pursuant to a valid prescription or order, from a practitioner or as provided in R.S. 40:978, while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to: a substance classified in Schedule I for an amount of: (a) An aggregate weight of less than two grams, shall be imprisoned, with or without hard labor, for not more than two years and may, in addition, be required to pay a fine of not more than \$50,000. (b) An aggregate weight of two grams or more but less than 28 grams, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years and may, in addition, be required to pay a fine of not more than \$5,000. (La R.S. 40:966).
- **Ecstasy (MDMA), Hallucinogens, and Phencyclidine Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense, a controlled dangerous substance or controlled

substance analogue classified in Schedule; to create, distribute or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule I; or to cultivate, possess, process, or sell industrial hemp, industrial hemp products, or viable industrial hemp seeds not in accordance with the U.S. Agriculture Improvement Act of 2018 or the plan submitted by the Department of Agriculture and Forestry that is in compliance with U.S. Department of Agriculture rules. Any person who violates Subsection A of this Section with respect to: a substance classified in Schedule I, upon conviction for an amount of: (a) An aggregate weight of less than 28 grams, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years and may, in addition, be required to pay a fine of not more than \$50,000. (b) An aggregate weight of 28 grams or more, shall be imprisoned at hard labor for not less than one year nor more than 20 years and may, in addition, be required to pay a fine of not more than \$50,000. (La R.S. 40:966).

- Please use the following link for a complete list of drugs classified as “Schedule I” drugs under Louisiana law: [Louisiana Laws - Louisiana State Legislature](#). Please use the following link to view the penalty in Louisiana for distribution or possession with intent to distribute narcotic drugs listed in Schedule I; possession of marijuana, synthetic cannabinoids and heroin: [Louisiana Laws - Louisiana State Legislature](#).
- **Opium, Opium Derivatives, and Narcotics listed in Schedule II Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance as classified in Schedule II unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, as provided in R.S. 40:978 while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to: (1) An aggregate weight of less than two grams, shall be imprisoned, with or without hard labor, for not more than two years and, in addition, may be sentenced to pay a fine of not more than \$5,000. (2) An aggregate weight of two grams or more but less than 28 grams shall be imprisoned, with or without hard labor, for not less than one year nor more than five years and, in addition, may be sentenced to pay a fine of not more than \$5,000. If a person knowingly or intentionally possesses a controlled substance as classified in Schedule II, unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, where the amount of the controlled substance is an aggregate weight of 28 grams or more, it shall be considered a violation of Subsection A of this Section (Manufacture/Distribution). (La R.S. 40:967).
- **Opium, Opium Derivatives, and Narcotics listed in Schedule II Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: (1) To produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense a controlled dangerous substance or controlled substance analogue classified in Schedule II (2) To create, distribute, or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule II. A substance classified in Schedule II for an amount of: (a) An aggregate weight of less than 28 grams, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years and may, in addition, be fined not more than \$50,000 (b) An aggregate weight of 28 grams or more, shall be imprisoned at hard labor for not less than one year nor more than 20 years and may, in addition, be fined not more than \$50,000. (La R.S. 40:967).
- **Cocaine Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance as classified in Schedule II unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, as provided in R.S. 40:978 while acting in the course

of his/her professional practice, or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to: (1) An aggregate weight of less than two grams, shall be imprisoned, with or without hard labor, for not more than two years and, in addition, may be sentenced to pay a fine of not more than \$5,000. (2) An aggregate weight of two grams or more but less than 28 grams shall be imprisoned, with or without hard labor, for not less than one year nor more than five years and, in addition, may be sentenced to pay a fine of not more than \$5,000. If a person knowingly or intentionally possesses a controlled substance as classified in Schedule II, unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, where the amount of the controlled substance is an aggregate weight of 28 grams or more, it shall be considered a violation of Subsection A of this Section (Manufacture/Distribution). (La R.S. 40:967).

- **Cocaine Manufacture/Distribution:** Production or manufacturing of cocaine or cocaine base or a mixture or substance containing cocaine or its analogues as provided in Schedule II(A)(4) of R.S. 40:964 or oxycodone as provided in Schedule II(A)(1)(p) of R.S. 40:964 or methadone as provided in Schedule II(B)(15) of R.S. 40:964 shall be sentenced to imprisonment at hard labor for not less than ten nor more than 30 years, at least ten years of which shall be served without benefit of parole, probation or suspension of sentence, and may be fined not more than \$500,000. Distribution of cocaine or cocaine base or a mixture or substance containing cocaine or its analogues as provided in Schedule II(A)(4) of R.S. 40:964 or oxycodone as provided in Schedule II(A)(1)(p) of R.S. 40:964 or methadone as provided in Schedule II(B)(15) of R.S. 40:964 in (a) An aggregate weight of less than 28 grams, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years and may, in addition, be fined not more than \$50,000. (b) An aggregate weight of 28 grams or more, shall be imprisoned at hard labor for not less than one year nor more than 20 years and may, in addition, be fined not more than \$50,000. (La R.S. 40:967).
- **Amphetamine or Methamphetamine Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance as classified in Schedule II unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, as provided in R.S. 40:978 while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to: (1) An aggregate weight of less than two grams, shall be imprisoned, with or without hard labor, for not more than two years and, in addition, may be sentenced to pay a fine of not more than \$5,000.(2) An aggregate weight of two grams or more but less than 28 grams shall be imprisoned, with or without hard labor, for not less than one year nor more than five years and, in addition, may be sentenced to pay a fine of not more than \$5,000. If a person knowingly or intentionally possesses a controlled substance as classified in Schedule II, unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, where the amount of the controlled substance is an aggregate weight of 28 grams or more, it shall be considered a violation of Subsection A of this Section (Manufacture/Distribution). (La R.S. 40:967).
- **Amphetamine or Methamphetamine Manufacture/Distribution:** Production or manufacturing of amphetamine or methamphetamine shall be sentenced to imprisonment at hard labor for not less than ten years nor more than 30 years, at least ten years of which shall be served without benefit of parole, probation, or suspension of sentence, and in addition may be sentenced to pay a fine of not more than \$500,000. Distribution of Amphetamine or Methamphetamine in (a) An aggregate weight of less than 28 grams, shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years and may, in addition, be fined not more than \$50,000. (b) An aggregate weight of 28 grams or

more, shall be imprisoned at hard labor for not less than one year nor more than **20** years and may, in addition, be fined not more than \$50,000. (La R.S. 40:967). (La R.S. 40:967).

- **Fentanyl Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance as classified in Schedule II unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, as provided in R.S. 40:978 while acting in the course of his/her professional practice, or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to Fentanyl or a mixture or substance containing a detectable amount of fentanyl or its analogues, or carfentanil or a mixture or substance containing a detectable amount of carfentanil or its analogues, upon conviction for an amount of: (a) An aggregate weight of less than two grams, shall be imprisoned, with or without hard labor, for not less than two years nor more than four years. (b) An aggregate weight of two grams or more but less than 28 grams, shall be imprisoned, with or without hard labor, for not less than two years nor more than ten years and may, in addition, be required to pay a fine of not more than \$5,000. (La R.S. 40:967).
- **Fentanyl Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense a controlled dangerous substance or controlled substance analogue classified in Schedule II or to create, distribute, or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule II. Any person who violates this Section with respect to Fentanyl or a mixture or substance containing a detectable amount of fentanyl or its analogues, or carfentanil or a mixture or substance containing a detectable amount of carfentanil or its analogues, shall be punished as follows: (a) On conviction of an aggregate weight of less than 28 grams, imprisonment at hard labor for not less than five years nor more than 40 years, at least five years of which shall be served without benefit of parole, probation, or suspension of sentence, and may, in addition, be required to pay a fine of not more than \$50,000. (b) On a first conviction of an aggregate weight of 28 grams or more but less than 250 grams, imprisonment at hard labor for not less than seven years nor more than 40 years, at least seven years of which shall be served without benefit of parole, probation, or suspension of sentence, and may, in addition, be required to pay a fine of not more than \$50,000. (c) On a second conviction of an aggregate weight of 28 grams or more but less than 250 grams, imprisonment at hard labor for not less than 30 years nor more than 40 years, at least ten years of which shall be served without benefit of parole, probation or suspension of sentence, and may, in addition, be required to pay a fine of not more than \$500,000. (d) On a third conviction of an aggregate weight of 28 grams or more but less than 250 grams, imprisonment at hard labor for not less than 99 years without benefit of parole, probation or suspension of sentence, and may, in addition, be required to pay a fine of not more than \$500,000. (e) On conviction of an aggregate weight of 250 grams or more, life imprisonment at hard labor, at least 25 years of which shall be served without benefit of parole, probation or suspension of sentence. If the offender unlawfully distributes or dispenses fentanyl or a mixture or substance containing a detectable amount of fentanyl or its analogues, or carfentanil or a mixture or substance containing a detectable amount of carfentanil or its analogues, which is the direct cause of serious bodily injury to the person who ingested or consumed the substance, the offense shall be classified as a crime of violence, and the offender shall be imprisoned at hard labor for an additional period of five years without benefit of probation, parole or suspension of sentence. The additional penalty imposed pursuant to this Subparagraph shall be served consecutively to the sentence imposed under this Paragraph. (La R.S. 40:967).

- Please use the following link for a complete list of drugs classified as “Schedule II” drugs under Louisiana law: [Louisiana Laws - Louisiana State Legislature](#). Please use the following link to view the Schedule II penalties in Louisiana: [Louisiana Laws - Louisiana State Legislature](#).
- **Schedule III Drug Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule III unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, or as provided in R.S. 40:978 or 1060.21, while acting in the course of his/her professional practice or except as otherwise authorized by this Part. Any person who violates this Subsection shall be imprisoned, with or without hard labor, for not less than one year nor more than five years and, in addition, may be required to pay a fine of not more than \$5,000. (La R.S. 40:968).
- **Schedule III Drug Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: to produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense a controlled dangerous substance classified in Schedule III or to create, distribute, or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule III. Any person who violates Subsection A of this Section with respect to any controlled dangerous substance classified in Schedule III shall be sentenced to a term of imprisonment, with or without hard labor, for not less than one year nor more than ten years and, in addition, may be sentenced to pay a fine of not more than \$15,000. (La R.S. 40:968).
- Please use the following link for a complete list of drugs classified as “Schedule III” drugs under Louisiana law: [Louisiana Laws - Louisiana State Legislature](#). Please use the following link to view the Schedule III penalties in Louisiana: [Louisiana Laws - Louisiana State Legislature](#).
- **Schedule IV Drug Possession:** It is unlawful for any person knowingly or intentionally to possess a controlled dangerous substance classified in Schedule IV unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, or as provided in R.S. 40:978, while acting in the course of his/her professional practice or except as otherwise authorized by this Part. Any person who violates this Subsection with respect to: (1) Flunitrazepam shall be imprisoned, with or without hard labor, for not less than one year nor more than ten years, and may, in addition, be required to pay a fine of not more than \$5,000.(2) Any other controlled dangerous substance shall be imprisoned with or without hard labor for not less than one year nor more than five years and, in addition, may be required to pay a fine of not more than \$5,000. (La R.S. 40:969). Whoever, with the intent to commit a crime of violence as defined in R.S. 14:2(B)(10) against an individual, violates Subsection A of this Section by administering a controlled dangerous substance to a person who is unaware that the controlled dangerous substance has been or is being administered to him, shall be sentenced to a term of imprisonment at hard labor for not less than five years nor more than 40 years and may be fined not more than \$100,000.
- **Schedule IV Drug Manufacture/Distribution:** It shall be unlawful for any person knowingly or intention (1) To produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense a controlled dangerous substance classified in Schedule IV. (2) To create, distribute or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule IV. Any person who violates this Section with respect to: (1) Flunitrazepam shall be sentenced to a term of imprisonment at hard labor for not less than one year nor more than 20 years and pay a fine of not more than \$50,000. (2) Any other controlled dangerous substance classified in

Schedule IV, except flunitrazepam, shall be sentenced to a term of imprisonment, with or without hard labor, for not less than one year nor more than ten years and, in addition, may be sentenced to pay a fine of not more than **\$15,000**. Whoever, with the intent to commit a crime of violence as defined in R.S. 14:2(B)(10) against an individual, violates this Section by administering a controlled dangerous substance to a person who is unaware that the controlled dangerous substance has been or is being administered to him, shall be sentenced to a term of imprisonment at hard labor for not less than five years nor more than 40 years and may be fined not more than \$100,000. (La R.S. 40:969).

- Please use the following link for a complete list of drugs classified as “Schedule IV” drugs under Louisiana law: [Louisiana Laws - Louisiana State Legislature](#). Please use the following link to view the Schedule IV penalties in Louisiana: [Louisiana Laws - Louisiana State Legislature](#).
- **Schedule V Drug Possession:** It is unlawful for any person unknowingly or intentionally to possess a controlled dangerous substance classified in Schedule V unless such substance was obtained directly or pursuant to a valid prescription or order from a practitioner, or as provided in R.S. 40:978, while acting in the course of his/her professional practice or except as otherwise authorized by this Part. Any person who violates this Subsection shall be imprisoned with or without hard labor for not less than one year nor more than five years and, in addition, may be required to pay a fine of not more than \$5,000. (La R.S. 40:970).
- **Schedule V Drug Manufacture/Distribution:** It shall be unlawful for any person knowingly or intentionally: (1) To produce, manufacture, distribute or dispense or possess with intent to produce, manufacture, distribute or dispense a controlled dangerous substance classified in Schedule V. (2) To create, distribute, or possess with intent to distribute, a counterfeit controlled dangerous substance classified in Schedule V. Any person who violates this Section with respect to any controlled dangerous substance classified in Schedule V shall be sentenced to a term of imprisonment, with or without hard labor, for not less than one year nor more than five years and, in addition, may be sentenced to pay a fine of not more than \$5,000. (La R.S. 40:970).
- Please use the following link for a complete list of drugs classified as “Schedule V” drugs under Louisiana law: [Louisiana Laws - Louisiana State Legislature](#). Please use the following link to view the Schedule IV penalties in Louisiana: [Louisiana Laws - Louisiana State Legislature](#).

III. Health Risks Associated with Abuse of Alcohol or Use of Illicit Drugs

Numerous health risks have been identified with substance abuse (use of illicit drugs and excessive use of alcohol). Abusers can lose resistance to disease, develop heart problems, contract infections or become malnourished, physically exhausted and even die.

Reality is often distorted, reactions may be slower, and the risk of accidents can increase. Extended substance abuse can cause coma, respiratory arrest and convulsions. Injected drugs increase the risk for infectious diseases such as hepatitis and AIDS. Body systems are affected. The liver, lungs and heart are damaged.

IV. Departments and/or Individuals Affected by Policy

This policy applies to all Tulane University students, Recognized Student Organizations and groups, faculty and staff regardless of the school or campus of which they are a member. This policy applies at all Tulane Sponsored or Related Events, whether on or off-campus, and on all university campus locations, including uptown, downtown, the Primate Center, Hebert Center, Elmwood, Maple Street and university-affiliated

housing. This policy does not apply to informal, off-campus events; the university uses a reasonable person standard to determine if an event should be covered by this policy.

V. Definitions

University Recognized Student Organization: A recognized student organization (RSO) is an autonomous student organization that is formally recognized by the university. An RSO is formed by currently enrolled students sharing a common goal or interest who have completed the RSO recognition process and agree to adhere to all university policies and procedures.

Administrative Permission: RSO administrative permission is granted through the Event Registration Process managed by the Division of Student Affairs. Departmental Program or Events administrative permission is granted through Campus Services.

Common Source: A common source of alcohol is the equivalent of more than one 12-pack (12 12-ounce bottles or cans) of beer or malt liquor, more than 1.5 liters of wine, more than 750ml of liquor or any combination of alcoholic beverages with a total amount that exceeds the maximum allowed quantities listed above. Kegs, vats, party balls, beer balls and boxed wine are also considered common sources.

Third-Party Vendor: A third-party vendor is an individual or entity that is properly licensed by the appropriate local and state authority to serve alcohol that is contracted to serve alcohol at any university Sponsored or Related Event, whether on or off-campus, and at any event at which alcohol will be served on university property.

Sober Event Monitor: A Sober Event Monitor maintains a safe social environment for all persons in attendance at social events. All Sober Event Monitors should have completed the current university required training, comply with the Tulane University Alcohol and Drug Policy and related protocols, and must be at least 21 years of age.

Event Host: An Event Host is defined as the organization, department or individual sponsoring the event. All hosts should comply with the Tulane University Alcohol and Drug Policy and related protocols.

University Sponsored or Related Events: For purposes of this policy, a university Sponsored or Related Event is an event that will be attended by students, faculty or staff members that meets one or more of the following criteria- (1) is registered with the university; (2) is affiliated or hosted by a Recognized Student Organization, department, unit, organization or activities that relate to the education, research and community service missions of the university or to the goals or objectives of the department, unit or organization of affiliation. All athletic-related events are also included.

VI. Roles and Responsibilities

The following offices collaborate to implement the Alcohol and Other Drug Policy: TUPD, Campus Health, Office of Student Conduct, Office of Fraternity and Sorority Programs, Office of Student Programs and Housing and Residence Life.

VII. Policy Details

The unauthorized possession, sale, or distribution of controlled substances or illegal drugs is unlawful. In addition to Louisiana law, Tulane's policies regarding the use of alcohol are:

- Individuals under 21 years of age may not consume, be served, possess or be provided alcohol anywhere on campus, at university Sponsored or Related Events, or in any manner inconsistent with Louisiana law.

- Alcohol may only be served at university Sponsored or Related Events, whether on or off-campus, with Administrative Permission. The vendor serving alcohol at the event is responsible for identifying those individuals at the event who can legally consume alcohol. Service shall not be provided to any individual without clear evidence of legal age.
- Faculty, staff and students of any age and their guests may not possess open containers of alcohol or consume alcohol-related beverages in public areas (such as lobbies, hallways, stairwells, balconies, walkways, patios/picnic areas, lounges or quads) except at a university Sponsored or Related Event that received Administrative Permission that specifically provides that open containers will be permitted.
- Drinking games and devices intended to accelerate the consumption of alcohol (including but not limited to funnels or beer bong) are not permitted on Tulane Property or at any university Sponsored or Related Events, including Tailgating or athletic events. Common Sources are not permitted.
- The service of alcohol on university Property or within university facilities must comply with the Exclusive Sponsorship and Nonexclusive Provider Agreement Contract.
- The university forbids the purchase, sale and delivery of alcoholic beverages without Administrative Permission.
- Students are prohibited from the unlawful manufacture, distribution, sale, possession or use of controlled substances both on and off-campus. Faculty and staff are prohibited from the unlawful manufacture, distribution, sale, possession or use of controlled substances in the workplace.
- All university staff and faculty are also subject to the alcohol and other drug policies contained in this and their respective employee guidelines.
- Students may not brew or distill alcoholic beverages in the residence halls.
- Publications of any type and in any media, including the Hullabaloo, New Wave, and other newspapers, pamphlets, flyers, websites, etc., that receive some or all of their funding from university sources (including student activity fee) must not accept or contain commercial advertising or other materials regarding alcohol. Alcohol manufacturers, distributors or drinking establishments may not advertise in or on university property, including but not limited to residence halls, recreation centers, kiosks or academic buildings. Similarly, university-Recognized Student Organizations shall not promote alcoholic beverage manufacturers, distributors or drinking establishments other than to announce a university event location.
- University funds may not be used for any portion of an event at which alcohol may be served to or consumed by minors or to purchase alcohol for any event hosted by an undergraduate Student Organization. Use of university funds for alcohol must be consistent with university procurement guidelines.
- If a Recognized Undergraduate Student Organization co-sponsors an event with a graduate or professional Recognized Student Organization, or if undergraduates are invited or present at an event, the policies governing undergraduate events must be followed.

Medical Amnesty Protocol (MAP)

Tulane University has the obligation to follow up with any student involved in an alcohol and drug related medical emergency. The potential for student conduct action by the university against the student in need of medical attention and/or the student reporting the incident may act as a barrier to students getting the medical attention they need.

The Code of Student Conduct is intended to provide all students with the ability to participate in the student conduct process and to seek assistance from the university as needed. In order to encourage students to disclose all relevant information, the university reserves the discretion to refrain from taking disciplinary action against any individual (including a witness or a third party) who shares information in the interest of any individual's health and safety or in the interest of the Core Values set forth in this Code.

This includes, but is not limited to, amnesty for the consumption of alcohol or other drugs at or near the time of any incident. The university may require an educational conference where support, resources, and educational counseling options may be discussed and potentially required with a learning action plan for an individual who has engaged in the illegal or prohibited use of alcohol or drugs. Amnesty may not be given if individuals or groups engage in deceptive behavior, have a significant delay in response or in any way endanger the safety of another. The Dean of Students, or designee, has final say as to whether amnesty should apply.

VIII. Policy Procedures

This policy and procedure will be reviewed annually by Campus Health, within the Division of Student Affairs.

IX. Sanctions

Faculty and staff members who violate this policy shall be referred to the appropriate unit administrator. Students and university-Recognized Student Organizations shall be referred to the Office of Student Conduct. University sanctions will depend upon the past record of the violator and the severity of the violation.

X. History

The Tulane Alcohol and Other Drug policy is developed in an alignment with Edgar Part 86. EDGAR is the federal requirement for Colleges and Universities to have alcohol policies.

XI. Forms/Tools/Resources

RSO Event Planning and Registration Guide – <https://lbc.tulane.edu/event-planning-registration>

Event Registration – <https://campusservices.tulane.edu/departments/event-management/planning-an-event/registration>

XII. Related Information

Related Policies and Protocols: Sober Event Monitor, Event Registration, Medical Amnesty Program, Code of Student Conduct, Community Living Standards, Parental Notification, EDGAR.

Drug-Free Schools and Communities Act (DFSCA) Compliance

Information related to alcohol and drug policies, standards of conduct, applicable disciplinary sanctions, health risks, counseling and treatment, processes, goals and objectives can be found online and within the DAAPP.

DRUG AND ALCOHOL ABUSE EDUCATION PROGRAMS

Tulane University provides a number of drug and alcohol abuse education programs including:

DEA Drug Take Back Day

TUPD monitors stations on each campus to collect prescription medications that are then picked up and disposed of by the Drug Enforcement Administration (DEA). This program is sponsored by the DEA and TUPD.

Brief Alcohol Screening and Intervention for College Students (BASICS)

Brief Alcohol Screening and Intervention for College Students (BASICS) is an individually administered prevention program for college students who drink alcohol and are at risk for alcohol-related problems.

Following a harm reduction approach, BASICS aims to motivate students to reduce alcohol use in order to decrease the negative consequences of drinking. Students are mandated to the program for violating the alcohol policy or receiving medical care from an alcohol overdose, or students can self-refer. This program is sponsored by The Well for Health Promotion.

Workshops

The Well for Health Promotion offers a variety of workshops for first years, Greek students and graduates that focus on harm reduction and alcohol poisoning prevention.

- The Buzz – Originally developed at the University of Arizona’s Campus Health Services, “The Buzz” is an alcohol education presentation that uses interactive activities and myth busting facts to facilitate a conversation about alcohol use on college campuses. This presentation involves trivia and a wide variety of games to provide useful information about alcohol in a playful and relaxed manner. Specifics: presented by TUPHEs, available virtually and in-person.
- Narco Knowledge – A 50-minute presentation about illegal drugs, misuse of Rx drugs and mixing alcohol and drugs. Discussion points include alcohol and drugs; harmful combinations; non-medical use of prescriptions. Specifics: one hour; presented by professional staff or peer health educators, available virtually and in-person.
- Risk in the Mix – This workshop details the interactions of different drugs with alcohol, from birth control and over the counter medications to illicit drugs, how overdose symptoms may present, and the best emergency response techniques in such scenarios, presented by peer health educators.

Health Communication

The Well develops content for and distributes health communication outreach events, digital bulletin boards, social media, posters and the Stall Street Journal covering a wide range of health topics, including substance abuse prevention. These health communication methods promote substance abuse prevention services and resources on campus, as well as offer education on strategies for risk reduction and bystander intervention in high-risk situations involving alcohol. Substance abuse prevention messages take priority at the beginning of the year and during known high-risk events in New Orleans including Mardi Gras and Voodoo Music Festival.

eCHECKUP TO GO

The Alcohol eCHECKUP TO GO for Colleges & Universities is a personalized, evidence-based, online prevention intervention. With regard to substance use, the personal feedback, used in conjunction with counseling, or as a stand-alone intervention, includes information that has been shown to be particularly motivating to high school and college-aged young adults:

- Quantity and Frequency of Use
- Amount Consumed
- Normative Comparisons
- Physical Health Information
- Amount and Percent of Income Spent
- Negative Consequences Feedback
- Explanation, Advice, and Local Referral Information

Drug Free Schools and Communities Act Compliance

Tulane University is committed to compliance with the Drug Free Schools and Communities Act. To view a list of applicable legal sanctions; and a description of sanctions for non-compliance with policy, please see

Tulane's most recent Biennial Review, Staff Handbook, Faculty Handbook and Code of Student Conduct linked below.

Biennial Review: [Tulane University Biennial Review Report](#)

Staff Handbook: <https://tulane.app.box.com/s/r66lu4pi2egwh5y9nd2actf217mqavd>

Faculty Handbook: https://provost.tulane.edu/sites/default/files/02.07.22%20Faculty_Handbook.pdf

Student Code of Conduct: <https://conduct.tulane.edu/code-conduct>

Drug and Alcohol Use Rehabilitation and Re-Entry Programs:

Tulane Recovery Community: Established January 2020;

Tulane University is committed to supporting students who are in recovery from substance use disorders and/or who identify as having a problematic relationship with alcohol and/or other substances. The Tulane Recovery Community's (TRC) mission is to support individualized recovery on campus by providing recovery-based programs that foster academic achievement, connection and engagement.

The Tulane Recovery Community Center official opened for the campus community in May 2023. The successful completion of this capital project highlights the only Collegiate Recovery Center in the state of Louisiana. The TRC Center serves as a dedicated space for students to commune, socialize, seek support and attend recovery support meetings.

Program Features:

- Weekly Recovery Support Meetings
- Dedicated Staff Member for support
- Community connection by promoting social and peer support
- Navigating barriers to a successful academic progression
- Normalizing recovery identity on campus
- Education, resources, and training to students, families, faculty, and staff
- Sober social activities on and off campus
- Connection to campus support services
- Alternative programming during high-risk times

Future Programming:

- Creation of a new position: live-in staff member for recovery housing and programming
- Structured substance free/recovery housing

ANNUAL DISCLOSURE OF CRIME STATISTICS: The following information provides context for the crime statistics reported as part of compliance with the Clery Act. The Tulane University Police Department (TUPD) is primarily responsible for preparing the Annual Security and Fire Safety Report. This responsibility is specifically designated to the Director of Clery Compliance or designee. TUPD collects the crime statistics disclosed in the charts through several methods. TUPD periodically examines the data to ensure that all reported crimes are recorded in accordance with the crime definitions outlined in the FBI Uniform Crime Reporting Handbook and the FBI National Incident-Based Reporting System Handbook (sex offenses only). In addition to the crime data that TUPD maintains, the statistics below also include crimes that are reported to various campus security authorities, as defined in this report. The Office of Student Conduct, Case Management and Victim Services, Title IX Office and Human Resources Department are key offices

from which drug, liquor and weapon offense referral data is obtained along with sexual offenses and potential reports of other Clery crimes.

Final report preparation is coordinated by the Director of Clery Compliance with Human Resources, Student Affairs, Housing and Residential Life, Campus Health, Emergency Preparedness, the Title IX Coordinator, TUPD and Facility Services, among others.

A written request for statistical information is made at least on an annual basis to all Campus Security Authorities or CSAs (as defined by federal law). CSAs are also informed in writing and/or through training to report crimes to TUPD in a timely manner so those crimes can be evaluated for timely warning purposes. It should be noted, at the university, all employees, including faculty and staff, are considered Campus Security Authorities. This is a policy of the institution that exceeds the requirements of the Clery Act. However, the Clery Act defines Campus Security Authority or CSA within four groups of individuals and organizations associated with an institution:

- A campus police department or a campus security department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department (e.g., an individual who is responsible for monitoring the entrance into an institutional property).
- Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings. An Official is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.

Additionally, the TUPD request crimes reported to local law enforcement that occur within Tulane's Clery geography. TUPD makes requests to local law enforcement outside the institution's Clery geography when students travel under the color of the institution. TUPD will make requests to the location of travel's appropriate law enforcement agency for crimes occurring within the location and timeframe of the student travel. Any qualifying crimes that occur during student travel will be classified as occurring on non-campus geography.

Statistical information is not requested from, nor is it provided by, Professional Counselors of the Counseling Center or Pastoral Counselors who are performing that function and role as their employment with the university. Professional Counselors and Pastoral Counselors are not required by law to provide statistics for this compliance document. Counseling and Pastoral Professionals, as defined by the Federal law, who act in such capacities, have been advised that, while they are not obligated to report crimes for the purpose of compiling these statistics, they are encouraged, when they deem it appropriate, to inform the persons they are counseling of their ability to report any crimes to TUPD for inclusion in the annual statistics.

All statistics are gathered, compiled, and reported to the campus community via this report, entitled the "Annual Security and Fire Safety Report," which is published by TUPD no later than Oct. 1 of each year. TUPD submits the annual crime statistics published in this brochure via a web-based reporting system to the Department of Education (ED). The statistical information gathered by the Department of Education is available to the public through the ED website.

Notice of Availability of the Annual Security and Fire Safety

Report TUPD sends an email to every enrolled student and current employee on an annual basis informing them of the availability of the Annual Security and Fire Safety Report. The email and letter include a summary of the contents of this report.

Specific Information about Classifying Crime Statistics

The statistics in this report are published in accordance with the definitions and many of the standards and guidelines used by the FBI Uniform Crime Reporting (UCR) Handbook, National Incident-Based Reporting System (NIBRS), relevant Federal law (the Clery Act), and applicable State law.

Clery Act Reporting

For Clery Act reporting purposes, the number of victims involved in a particular incident is indicated in the statistics column for the following crime classifications: Murder/Non-Negligent Manslaughter, Manslaughter by Negligence, Sex Offenses, and Aggravated Assault. For example, if an aggravated assault occurs and there are three victims, this would be counted as three aggravated assaults in the crime statistics chart. The number reflected in the statistics for the following crime categories includes one offense per distinct operation: Robbery, Burglary, Larceny, Vandalism and Arson. For example, if five students are walking across campus together and they are robbed, this would count as one instance of robbery in the crime statistics chart. In cases of Motor Vehicle Theft, each vehicle stolen is counted as a statistic. In cases involving Liquor Law, Drug Law and Illegal Weapons Law violations, the statistics indicate the number of people arrested by law enforcement or referred to the Office of Student Rights and Responsibilities or Human Resources for possible disciplinary action for violations of those specific laws.

Hate crimes are reported in narrative form and are separated by category of prejudice. A hate crime is not a separate, distinct crime, but is the commission of a criminal offense that was motivated by the offender's bias. For example, a subject assaults a victim, which is a crime. If the facts of the case indicate that the offender was motivated to commit the offense because of their bias against the victim's race, sexual orientation, gender, religion, ethnicity, national origin, gender identity or disability, the assault is then also classified as a hate crime. For Clery Act Purposes, Hate Crimes include any of the following offenses that are motivated by the offender's bias: Murder and Non-negligent Manslaughter, Sexual Offenses (rape, fondling, incest and statutory rape), Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Larceny-Theft, Simple Assault, Intimidation and Destruction/Damage/ Vandalism of Property.

Campus SaVE was signed into law on March 7, 2013, as part of the reauthorization of the Violence Against Women Act (VAWA); it covers students and staff of institutions of higher education and amends the Jeanne Clery Act to include new reporting requirements for Domestic Violence, Dating Violence and Stalking and additional policy statements and training requirements.

Geography Definitions from the Clery Act

On-Campus defined as: (1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of or in a manner related to the institution's educational purposes, including residence halls; and (2) Any building or property that is within or reasonably contiguous to the area identified in paragraph (1), that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purposes (such as a food or retail vendor).

Non-Campus Building or Property defined as: (1) Any building or property owned or controlled by a student organization that is officially recognized by the institution (i.e. privately owned fraternity); or (2)

Any building or property owned or controlled by an institution that is used in direct support of or in relation to the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

The Non-Campus Geography definition includes buildings or properties under temporary control during institutionally sponsored short-stay-away domestic or international trips for students of more than one night, or buildings or properties under temporary control during institutionally sponsored domestic or international trips for students to repeated locations.

For example, students in the debate club take a trip to Washington, D.C. and stay at the same hotel every year. In this example, the institution must include in their Clery Act crime statistics any Clery Act crimes that occur in the rooms used by the students and any common areas used to access those rooms; including the lobby, elevator and staircases.

Public Property defined as: All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus or on-campus property/facilities. Tulane U crime statistics do not include crimes that occur in privately owned homes or businesses within or adjacent to the campus boundaries.

On-campus Student Housing Facility defined as: Any student housing facility that is owned or controlled by the institution or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility. This category is considered a subset of the On-Campus category. Reasonably Contiguous defined as: Any building or property an institution owns or controls that is in a location that students consider to be, and treat as, part of the "campus."

Reportable Clery Crime Definitions

The following definitions are to be used for reporting the crimes listed in the Clery Act, in accordance with the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Program.

The definitions of murder/non-manslaughter by negligence, rape, robbery, aggravated assault, burglary, motor vehicle theft, weapons: carrying, possessing, etc., law violations, drug abuse violations and liquor law violations are from the "Summary Reporting System (SRS) User Manual" from the FBI's UCR Program.

The definitions of fondling, incest, and statutory rape are excerpted from the "National Incident-Based Reporting System (NIBRS) User Manual" from the FBI's UCR Program. The definitions of larceny-theft (except motor vehicle theft), simple assault, intimidation and destruction/damage/vandalism of property are from the "Hate Crime Data Collection Guidelines and Training Manual" from the FBI's UCR Program.

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.

Criminal Homicide—Manslaughter by Negligence: The killing of another person through gross negligence.

Criminal Homicide—Murder and Nonnegligent Manslaughter: The willful (nonnegligent) killing of one human being by another.

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

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

Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by 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 which could and probably would result in serious personal injury if the crime were successfully completed.)

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

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned—including joyriding.)

Weapons: Carrying, Possessing, etc.: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons.

Drug Abuse Violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of State and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

Liquor Law Violations: The violation of State or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Unfounded Crime Reports: According to Uniform Crime Report (UCR) guidelines, a reported offense can be cleared as unfounded by a sworn law enforcement authority “if the investigation shows that no offense occurred nor was attempted.” These cases thus remain as official crime reports and are included in the departmental statistics; however, they are explicitly labeled as “unfounded” cases within UCR reports on the various index crimes. According to UCR guidelines, the statistics on unfounded cases should include crime reports that are either: False or Baseless.

Crime Definitions from the National Incident-Based Reporting System (NIBRS) User Manual from the FBI's UCR Program Sex Offenses

Sex Offenses: Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. Under the Clery Act, the four defined sex

offenses for which crime statistics must be collected on Clery geography are: **rape, fondling, incest and statutory rape.**

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

Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

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

Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Crime Definitions from the Hate Crime Data Collection Guidelines and Training Manual from the FBI's UCR Program

Hate Crimes: Any of the above offenses, and any other crime involving bodily injury, reported to local police agencies or campus security authority that manifest evidence that the victim was intentionally selected because of the perpetrator's bias, or the perpetrator perceived the person to be in one of the protected group categories. Additionally, on Aug. 14, 2008, the Clery Act was amended to include larceny/simple assault, intimidation and destruction/damage/vandalism (except arson) as reportable categories of hate crimes. These new reporting categories are only reported if motivated by bias as determined by one of the designated bias categories. The types of bias categories include race, gender, religion, sexual orientation, ethnicity, national origin, gender identity and disability.

Hate Crime Definitions: To ensure uniformity in reporting nationwide, the following definitions have been adopted for use in hate crime reporting:

Bias: A preformed negative opinion or attitude toward a group of persons based on their race, religion, gender, gender identity, disability, sexual orientation, ethnicity or national origin.

Bias Crime: A criminal offense committed against a person or property that is motivated, in whole or in part, by the offender's bias against a race, religion, disability, sexual orientation, ethnicity or national origin; also known as Hate Crime. Note: Even if the offender was mistaken in their perception that the victim was a member of the group the offender was acting against, the offense is still a bias crime because the offender was motivated by bias against the group.

Larceny-Theft (Except Motor Vehicle Theft): The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

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.

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

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

Unfounded Crime Reports: According to Uniform Crime Report (UCR) guidelines, a reported offense can be cleared as unfounded by a sworn law enforcement authority “if the investigation shows that no offense occurred nor was attempted.” These cases thus remain as official crime reports and are included in the departmental statistics; however, they are explicitly labeled as “unfounded” cases within UCR reports on the various index crimes. According to UCR guidelines, the statistics on unfounded cases should include crime reports that are either: False or Baseless.

Domestic Violence, Dating Violence, and Stalking Additions from the 2014 VAWA Negotiated Rulemaking Final Consensus Language

Domestic Violence

The Federal definition (from VAWA) of **Domestic Violence:** a felony or misdemeanor crime of violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- By any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Dating Violence

The Federal definition (from VAWA) of **Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party’s statement with consideration of: the length of the relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship.

For the purposes of this definition:

- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- Dating violence does not include acts covered under the definition of domestic violence.

Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Stalking

The Federal definition (from VAWA) of **Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress.

For the purposes of this definition:

- **Course of Conduct**: Means two or more acts, including, but not limited to, acts which the stalker directly, indirectly or through third parties, by any action, method, device or means follows, monitors, observes, surveils, threatens or communicates to or about a person or interferes with a person's property.
- **Reasonable Person**: Means a reasonable person under similar circumstances and with similar identities to the victim.
- **Substantial Emotional Distress**: Means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

HAZING

Hazing Prevention and Awareness Programs

Tulane has partnered with Vector Solutions to provide training on hazing for every Tulane University student, faculty and staff member. At the beginning of each semester, students will receive an email with information about how to login and complete the training. Students who are involved in organizations are required by law to do an additional hour of training. The university has created a CANVAS course that will satisfy this requirement. Organizations may also take advantage of other training opportunities to satisfy this requirement, but they are responsible for making sure that all of their members complete two hours of hazing training.

How to Report Incident of Hazing

Anyone with knowledge of hazing should report immediately. If there is an immediate threat to safety, we encourage you to contact the Tulane University Police at 504-865-5911 or dial 9-1-1. You may also report using Tulane's online reporting form found here: [Concern Report](#). While you can report anonymously, it may limit our ability to follow-up on the report. Tulane has partnered with RealResponse, a company which allows anonymous texting. You must opt into this when you file the concerns report.

The Office of Student Conduct reviews all allegations of hazing. Hazing is a major matter and the University will follow the Major Matter Investigation process as described here: [Formal Hearing Process Information Page | tulane](#).

Tulane's Hazing Policy

Hazing includes, but is not limited to, acts of servitude and/or behavior that humiliates, degrades, embarrasses, harasses or ridicules an individual, or otherwise is harmful or potentially harmful to an individual's physical, emotional, or psychological wellbeing, as an actual or apparent condition for initial or continued affiliation with any group. A student or organization violates this standard regardless of either the lack of intent to cause harm or the hazed individual's own willingness to participate. Unless affirmative steps were taken by the responding student or organization to prevent the hazing behavior, conduct charges may be brought against the group, officers of the group, and members of the group who are

deemed to have encouraged, witnessed or knew about the behavior, in addition to any conduct action against persons who engaged in the hazing behavior itself.

Tulane University treats all allegations of hazing with the utmost seriousness. The university has zero tolerance for hazing. Therefore, violations of the university's hazing policy are subject to the full range of accountability sanctions (warning, suspension, or expulsion) Educational sanctions may also be issued. Any student or organization found responsible for hazing that meets Louisiana statutory definition of hazing will, at a minimum, be suspended from the university, and may face criminal prosecution which may result in imprisonment up to five years and/or fines up to \$10,000. Hazing is defined by the state of Louisiana as follows:

Hazing means any intentional, knowing, or reckless act by a person acting alone or acting with others that is directed against another when both of the following apply:

- (i) The person knew or should have known that such an act endangers the physical health or safety of the other person or causes severe emotional distress.
- (ii) The act was associated with pledging, being initiated into, affiliating with, participating in, holding office in, or maintaining membership in any organization. Consent is not a defense.
- (iii) Hazing includes but is not limited to any of the following acts associated with pledging, being initiated into, affiliating with, participating in, holding office in, or maintaining membership in any organization:
 - a. Physical brutality, such as whipping, beating, paddling, striking, branding, electric shocking, placing of a harmful substance on the body or similar activity.
 - b. Physical activity, such as sleep deprivation, exposure to the elements, confinement in a small space or calisthenics, that subjects the other person to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.
 - c. Activity involving consumption of food, liquid or any other substance, including but not limited to an alcoholic beverage or drug, that subjects the individual to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.
 - d. Activity that induces, causes or requires an individual to perform a duty or task that involves the commission of a crime or an act of hazing.

For purposes of this Policy, hazing shall not include a physical activity that is normal, customary and necessary for a person's training and participation in an athletic, physical education, military training or similar program sanctioned by the postsecondary education institution.

Organization is a fraternity, sorority, association, corporation, order, society, corps, cooperative, club, service group, social group, band, spirit group, athletic team or similar group whose members are primarily students at, or former students of, a postsecondary education institution, including the national or parent organization of which any of the underlying entities provided for in this definition is a sanctioned or recognized member at the time of the hazing.

Pledging is any action or activity related to becoming a member of an organization, including recruitment and rushing.

Appropriate authority includes:

- (i) Any state or local law enforcement agency.

- (ii) A 911 Public Safety Answering Point as defined in Title 33 of the Louisiana Revised Statutes of 1950.
- (iii) Emergency medical personnel.

Reckless behavior is an activity or behavior in which a reasonable person knew or reasonably should have known that the activity or behavior may result in injury to another, including but not limited to excessive consumption of alcohol, binge drinking, drag racing, consumption of any controlled dangerous substance, acts of hazing or other similar activity.

Serious bodily injury is bodily injury that involves unconsciousness, extreme physical pain or protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty, death or a substantial risk of death.

These definitions apply to any registered student organization. A student acting on behalf of an unrecognized organization may also face conduct action.

In accordance with Act 637 of 2018, codified at R.S. 14:502, this policy shall require any person at the scene of an emergency who knows that another person has suffered bodily injury caused by an act of hazing shall, to the extent that the person can do so without danger or peril to self or others, give reasonable assistance to the injured person.

Tulane University complies with any and all municipal, state and federal legislation, including the Louisiana hazing statutes. Reports of hazing will be turned over to TUPD and/or local law enforcement, in compliance with applicable state laws.

Tulane University complies with any and all municipal, state and federal legislation, including the Louisiana hazing statutes. Reports of hazing will be turned over to local law enforcement, in compliance with applicable state laws.

THE LOUISIANA BOARD OF REGENTS UNIFORM POLICY ON PUBLIC INFORMATION ON HAZING PREVENTION

I. POLICY STATEMENT

The Board of Regents (BOR) does not condone hazing in any form at any postsecondary education institution in the state. All Louisiana postsecondary institutions shall prohibit hazing and take all reasonable measures to address hazing, including without limitation: adoption of effective policies; clear communication to campus organizations, students and other stakeholders of laws and policies; prompt and faithful enforcement thereof; education; and training. All Louisiana postsecondary institutions shall be committed to providing a supportive educational environment free from hazing, one that promotes its students' mental and physical well-being, safety and respect for oneself and others. All Louisiana postsecondary institutions shall implement policies and procedures in compliance with this policy and shall take prompt and appropriate action to investigate and effectively discipline those accused of such conduct in a manner consistent with all applicable laws.

II. INTRODUCTION

In accordance with Act 382 of the 2019 Regular Session of the Louisiana Legislature (“Act 382”), the Louisiana Board of Regents (“BOR”) hereby adopts this Uniform Policy on Public Information on Hazing Prevention (“Policy”) applicable to all Louisiana postsecondary education institutions. This Policy aims to enhance the Legislature’s efforts to make relevant nonconfidential information on hazing incidents reported at an institution or by the institution’s students available to the public in accordance with applicable laws and regulations. This Policy is intended to be implemented in conjunction with the BOR Uniform Policy on Hazing Prevention.

For purposes of this Policy, the definitions of key terms and other mandatory provisions shall remain consistent with those in Acts 640 and 635 and 637 of 2018, and Act 382 of 2019, codified at R.S. 17:1801.1, R.S. 14:40.8 and R.S. 14:502. BOR will amend this Policy to reflect any subsequent changes to these statutes. In cases of any inconsistency, the statutory provisions shall supersede any such inconsistent provision in this Policy. The statutory provisions and this Policy shall supersede any inconsistent provision in an institution’s policy.

III. DEFINITIONS

For purposes of this Policy, Information on Reported Hazing shall mean the information required to be reported by institutions and organizations to law enforcement under Act 382. All other terms, including Hazing, Institutions and Organizations, shall have the same meaning as defined in Acts 640, 635 and 637 of 2018 and Act 382 of 2019.

IV. PUBLIC ACCESS TO INFORMATION ON REPORTED HAZING

When an institution or organization receives sufficiently credible and specific information about an alleged act of Hazing, the institution or organization shall make the Information on Reported Hazing public, subject to the following restrictions and exemptions:

- a. The Information on Reported Hazing shall be redacted to comply to the fullest extent with applicable laws and regulations, including the Family Educational Rights and Privacy Act and the Health Insurance Portability and Accountability Act; and
- b. After necessary redactions have been made pursuant to Subsection IV(a) above, any other information or details that could reasonably lead to the identification of the individual(s) involved in the incident or reasonably jeopardize the safety of the person reporting the incident shall be redacted.

The Information on Reported Hazing, with the redactions authorized above, shall be made public on each institution’s website specific to hazing; in addition, an institution may also make such information available on any platform related to hazing, such as brochures or other materials or other source of information that an organization or institution maintains or uses.

Hazing Investigation Process

Allegations of hazing will be investigated using the Major Matter Investigation Process. This investigation process is instituted in cases that may result in a separation from the university community (i.e. suspension or expulsion). All hearings will be closed and attendance will be limited to the accused student or group and his/her/its university approved advisor, the Complainant and his/her/its university approved advisor, the Hearing Board Members or Conduct Officer, the Investigator, the Hearing Board Chair, and necessary security personnel if required. A witness will attend the Hearing for his/her testimony only and will be excused after his/her testimony is complete. If the accused student and Complainant consent, a Conduct Officer may observe a hearing for purposes of training. In issues involving sexual and/or gender-based harassment and violence, the Code allows for the use of an advisor outside of the university community.

Major Matter Investigation Procedure:

Procedural Meeting. The Student Conduct Administrator or designee will meet separately with the Respondent and Complainant to provide a written statement outlining their rights and details of the investigation process.

Impartial Investigator. The Investigator shall be fair and impartial. If applicable, the Investigator shall disqualify themselves on grounds of personal bias. The Student Conduct Administrator or designated representative has final authority to resolve any questions of personal bias.

Investigation. During the investigation, the Investigator will provide the individuals a fair and equal opportunity to be heard, opportunities to submit information, and to identify witnesses who may have relevant information. The Investigator will speak separately with individuals who are willing to participate and have information relevant to the determination of responsibility. As part of the investigation, the Investigator may gather or receive information that is relevant to the determination of appropriate consequences, including information about any impacts on any member of the Tulane community. The investigator will also gather available physical or documentary evidence, including prior statements, any relevant communications, e-mail messages, social media materials, text messages and other records as appropriate and available.

The Investigator will prepare a written report that summarizes the information gathered, synthesizes the areas of agreement and disagreement among or between individuals and/or organizations with any supporting information or accounts, and includes an investigative finding regarding whether any rule has been violated. However, before the report is finalized, necessary individuals and/or organizations will be given the opportunity to review a draft of the investigation report, which may be presented in redacted format to protect the privacy rights of individuals involved in the investigation.

Upon receipt of any additional information from individuals and/or organizations involved in the process, or after the ten (10) business day comment period has lapsed without comment, the Investigator will make a final investigative determination, by a preponderance of the evidence, regarding whether a rule transgression has occurred and will recommend consequences, if any. In reaching these determinations, the investigator may consult with the Office of Institutional Equity, the Title IX Coordinator, and any designated administrator who has information relevant to the investigation. The investigator may also seek information from the Office of Student Conduct regarding prior disciplinary history and Tulane University Police Department regarding prior criminal history.

Advisor. Advisors may not participate in the proceedings except to advise the Complainant or Respondent. In Title IX Sexual Harassment cases, advisors have a more involved role in live hearings.

Investigator. With the exception of regulatory, live Title IX hearing processes, the Investigator participates when the Student Conduct Administrator or designee determines the allegations are a major matter. The Investigator serves as a specially trained, neutral party. When involved, the Investigator will decide responsibility and recommend sanctions.

Witnesses and Testimony. The Respondent and Complainant shall be offered the opportunity to identify their own witnesses and to question one another's witnesses through the Investigator. The Investigator has the discretion to determine the relevance of any witness or other evidence to the finding of responsibility and may exclude information in preparing the investigation report if the information is irrelevant, immaterial or more prejudicial than informative. The Investigator may also exclude statements of personal opinion by witnesses and statements as to general reputation for any character trait, including honesty. Under this Code, "character evidence" is defined as: information that does not directly relate to the facts at issue, but instead reflects upon the reputation, personality, qualities, or habits of an individual. Generally, information regarding character is not relevant to the determination of whether there has been a violation of this Code.

- All members of the University community with knowledge of facts pertinent to the case are expected to cooperate fully in conduct proceedings and investigations. A witness's unreasonable failure to cooperate in conduct proceedings may result in conduct action.
- All persons who provide information shall be asked to affirm that their statements are truthful. Furnishing false information to the University may result in the filing of conduct charges against students.

Impact Statement. The Complainant and Respondent will be provided the opportunity to submit a written Impact Statement. These written Impact Statements will not be considered in the determination of responsibility, but will be provided to the Investigator, and at the appropriate stage of the process, to the disciplinary authority or Hearing Panel for consideration in the determination of the sanction and remedy. The Impact Statement may be submitted at any time in the process, provided that it is received no later than ten (10) business days after the parties have been given notice of the opportunity to review the draft Investigative Report. The Investigator may also consider a community Impact Statement as appropriate based on the nature and facts of the circumstances and the extent to which the conduct at issue was directed at and created a hostile environment for community members beyond the Reporting Party. The investigator may limit the submission or use of community Impact Statements. Respondents will be notified of the final Investigative determination in writing and at the same time, via e-mail. The final investigative determination may be redacted in light of privacy rights of impacted individuals.

Determination. In investigations of major matters with organizational Respondents, the Investigator will submit their findings to the Student Hearing Panel. After reviewing the Investigator's findings and rationale, the panel will recommend consequences for the organization. The chairperson will then forward the Investigator's findings, along with the panel's recommendations and a brief description of the proceedings to the Assistant Vice President for Campus Life or designee, who may choose to accept or reject the recommendations regarding transgressions and consequences. The Assistant Vice President for Campus Life or designee reviews the recommendations and consequences from the student hearing panel, and may adjust them before they become final, subject to an organization's right to appeal.

In investigations of major matters with student Respondents, the Investigator determines a finding and corresponding consequences. In determining the appropriate consequences, the investigator shall consider the following factors:

- The nature of any behavior, including violence;
- the impact of behavior on other individuals or groups;
- the impact or implications of the behavior on the community or the University;
- prior transgressions, both at the University or elsewhere, including criminal convictions;
- whether a student or student organization has accepted responsibility for the conduct;
- maintenance of a safe and respectful environment conducive to learning;
- protection of the University community;
- any applicable professional standards of behavior;
- and any other mitigating, aggravating, or compelling circumstances to reach a just and appropriate resolution in each matter.

Timeline. In general, Tulane University will seek to conclude the investigation within 180 business days from the issuance of the notice of investigation, although special circumstances may extend this time frame. The time frame for completion of the investigation, or any designated time frames of steps in the investigation, may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, to comply with a request by external law enforcement, to accommodate the availability of witnesses, to account for Tulane University breaks or vacations, to account for complexities of a case (including the number of witnesses and volume of information provided by the parties), or to address other legitimate reasons as defined by the investigator. Any extension of the timeframe, and the reason for the extension, will be shared with the impacted individuals in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Louisiana Hazing Laws

La R.S. 14:40.8 – Criminal Hazing

A.(1) Except as provided by Subsection D of this Section, it shall be unlawful for any person to commit an act of hazing.

(2)(a) Except as provided by Subparagraph (b) of this Paragraph, any person who commits an act of hazing shall be either fined up to one thousand dollars, imprisoned for up to six months, or both.

(b) If the hazing results in the serious bodily injury or death of the victim, or the hazing involves forced or coerced alcohol consumption that results in the victim having a blood alcohol concentration of at least 0.30 percent by weight based on grams of alcohol per one hundred cubic centimeters of blood, any person who commits an act of hazing shall be fined up to ten thousand dollars and imprisoned, with or without hard labor, for up to five years.

B.(1)(a) If any person serving as a representative or officer of an organization, including any representative, director, trustee, or officer of any national or parent organization of which any of the underlying entities provided for in Paragraph (C)(3) of this Section is a sanctioned or recognized member at the time of the hazing, knew and failed to report, as soon as practicable under the circumstances, to law enforcement that one or more of the organization's members were hazing another person, the organization may be subject to the following:

- (i) Payment of a fine of up to \$10,000.

(ii) Forfeiture of any public funds received by the organization.

(iii) Forfeiture of all rights and privileges of being an organization that is organized and operating at the education institution for a specific period of time as determined by the court. If the hazing results in the serious bodily injury or death of the victim, or results in the victim having a blood alcohol concentration of at least 0.30 percent by weight based on grams of alcohol per 100 cubic centimeters of blood, the period of time shall be for not less than four years.

(b) Information reported to law enforcement as provided in Subparagraph (a) of this Paragraph shall include all details received by the organization relative to the alleged incident, with no information being redacted, including the name of all individuals alleged to have committed the act or acts of hazing.

(c) An education institution that receives a report alleging the commission of an act or acts of hazing by one or more members of an organization that is organized and operating at the education institution shall report, as soon as practicable under the circumstances, the alleged act or acts to the law enforcement agency having jurisdiction in the place where the alleged act or acts of hazing occurred. The information reported to law enforcement as required by this Paragraph shall include all details received by the institution relative to the alleged incident, with no information being redacted, including the name of all individuals alleged to have committed the act or acts of hazing. Any education institution who fails to comply with the provisions of this Paragraph may be subject to a fine of up to \$10,000.

C. For purposes of this Section:

(1) "Education institution" means any elementary or secondary school or any postsecondary education institution in this state.

(2)(a) "Hazing" is any intentional, knowing or reckless act by a person acting alone or acting with others that is directed against another when both of the following apply:

(i) The person knew or should have known that the act endangers the physical health or safety of the other person or causes severe emotional distress.

(ii) The act was associated with pledging, being initiated into, affiliating with, participating in, holding office in or maintaining membership in any organization.

(b) "Hazing" includes but is not limited to any of the following acts associated with pledging, being initiated into, affiliating with, participating in, holding office in or maintaining membership in any organization:

(i) Physical brutality, such as whipping, beating, paddling, striking, branding, electronic shocking, placing of a harmful substance on the body or similar activity.

(ii) Physical activity, such as sleep deprivation, exposure to the elements, confinement in a small space or calisthenics, that subjects the other person to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.

(iii) Activity involving consumption of food, liquid or any other substance, including but not limited to an alcoholic beverage or drug, that subjects the individual to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.

(iv) Activity that induces, causes or requires an individual to perform a duty or task that involves the commission of a crime or an act of hazing.

(c) A physical activity that is normal, customary and necessary for a person's training and participation in an athletic, physical education, military training or similar program sanctioned by the education institution is not considered "hazing" for purposes of this Section.

(3) "Organization" means a fraternity, sorority, association, corporation, order, society, corps, cooperative, club, service group, social group, band, spirit group, athletic team or similar group whose members are primarily students at, or former students of, an education institution. "Organization" includes the national or parent organization of which any of the underlying entities provided for in this Paragraph is a sanctioned or recognized member at the time of the hazing.

(4) "Pledging", also known as "recruitment" or "rushing", means any action or activity related to becoming a member of an organization.

D.(1) This Section does not apply to an individual who is the subject of the hazing, regardless of whether the individual voluntarily allowed himself to be hazed.

(2) It is not a defense to prosecution for a violation of this Section that the individual against whom the hazing was directed consented to or acquiesced in the hazing.

E.(1) The penalties provided in Subsection B of this Section may be imposed in addition to any penalty that may be imposed for any other criminal offense arising from the same incident or activity, and in addition to any penalty imposed by the organization or education institution pursuant to its by-laws, rules, or policies regarding hazing.

(2) Nothing in this Section precludes any civil remedy provided by law.

La R.S. 14:502 – Failure to Seek Assistance

A.(1) Any person at the scene of an emergency who knows that another person has suffered serious bodily injury shall, to the extent that the person can do so without danger or peril to self or others, give reasonable assistance to the injured person. Reasonable assistance includes immediately seeking or reporting the need for medical assistance from an appropriate authority.

(2) Any person who engages in reckless behavior that results in the serious bodily injury of any person shall, to the extent that the person can do so without danger or peril to self or others, give reasonable assistance to the person. Reasonable assistance includes immediately seeking or reporting the need for medical assistance from an appropriate authority.

B. For purposes of this Section:

(1) "Appropriate authority" includes:

(a) Any state or local law enforcement agency.

(b) A 911 Public Safety Answering Point as defined in Title 33 of the Louisiana Revised Statutes of 1950.

(c) Emergency medical personnel.

(2) "Reckless behavior" means an activity or behavior in which a reasonable person knew or reasonably should have known that the activity or behavior may result in injury to another, including but not limited to excessive consumption of alcohol, binge drinking, drag racing, consumption of any controlled dangerous substance, acts of hazing or other similar activity, including activity which is defined as a criminal offense under this Title.

C.(1) Except as provided in Paragraph (2) of this Subsection, any person who violates the provisions of this Section shall be fined not more than \$1,000, imprisoned with or without hard labor for not more than one year, or both.

(2) If the serious bodily injury results in the death of the person, any person who violates the provisions of this Section shall be fined not more than \$2,000, imprisoned with or without hard labor for not more than five years, or both.

La R.S. 17:1801 – Hazing Prohibited; Reporting; Documentation

A. Hazing in any form, or the use of any method of initiation into organizations in any education institution supported wholly or in part by public funds, which is likely to cause bodily danger or physical punishment to any student or other person attending any such institution is prohibited.

B. Whoever violates the provisions of this Section shall be expelled, suspended, or dismissed from the education institution and not permitted to return for at least one semester, quarter, or comparable

academic period. In addition, the person violating the provisions of this Section may also be subject to the provisions of R.S. 14:40.8 which provides penalties for certain hazing activities.

C. (1) If an organization has taken disciplinary action against one of its members for hazing or has reason to believe that any member of the organization has participated in an incident of hazing, the organization shall report the incident to the institution with which it is affiliated. If an organization or any of its members has been disciplined by a parent organization for hazing, the organization shall report the hazing for which the organization was disciplined to the institution with which it is affiliated.

(2) When the institution receives a report of an alleged incident of hazing pursuant to the provisions of Paragraph (1) of this Subsection, the institution shall do both of the following:

(a) Report to law enforcement as required by R.S. 14:40.8. The information reported to law enforcement shall include all information and details received by the institution relative to the alleged incident, with no information being redacted, including the name of all individuals alleged to have committed the act or acts of hazing identified in the report.

(b) Document in writing all actions taken with regard to the report including but not limited to the date the report was received, reports made to law enforcement as provided in R.S. 14:40.8, and any other information relative to the institution's investigation, processing, and resolution of the incident.

(3) The Board of Regents, in consultation with the public postsecondary education management boards, shall develop the following:

(a) A standardized form that organizations shall use in making the reports required by Paragraph (1) of this Subsection.

(b) A standardized form that institutions shall use to document such reports, reports made to law enforcement as provided in R.S. 14:40.8, and the manner in which each hazing incident is handled and resolved at the institution level.

(c) A policy relative to making available to the public certain information relative to hazing that is documented pursuant to this Paragraph.

D. For purposes of this Section and R.S. 17:1801.1:

(1)(a) "Hazing" means any intentional, knowing or reckless act by a person acting alone or acting with others that is directed against another when both of the following apply:

(i) The person knew or should have known that such an act endangers the physical health or safety of the other person or causes severe emotional distress.

(ii) The act was associated with pledging, being initiated into, affiliating with, participating in, holding office in or maintaining membership in any organization.

(b) "Hazing" includes but is not limited to any of the following acts associated with pledging, being initiated into, affiliating with, participating in, holding office in or maintaining membership in any organization:

(i) Physical brutality, such as whipping, beating, paddling, striking, branding, electric shocking, placing of a harmful substance on the body or similar activity.

(ii) Physical activity, such as sleep deprivation, exposure to the elements, confinement in a small space, or calisthenics, that subjects the other person to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.

(iii) Activity involving consumption of food, liquid, or any other substance, including but not limited to an alcoholic beverage or drug, that subjects the individual to an unreasonable risk of harm or that adversely affects the physical health or safety of the individual or causes severe emotional distress.

(iv) Activity that induces, causes, or requires an individual to perform a duty or task that involves the commission of a crime or an act of hazing.

(c) A physical activity that is normal, customary, and necessary for a person's training and participation in an athletic, physical education, military training, or similar program sanctioned by the postsecondary education institution is not considered "hazing" for purposes of this Section.

(2) "Organization" means a fraternity, sorority, association, corporation, order, society, corps, cooperative, club, service group, social group, band, spirit group, athletic team, or similar group whose members are primarily students at, or former students of, a postsecondary education institution. "Organization" includes the national or parent organization of which any of the underlying entities provided for in this Paragraph is a sanctioned or recognized member at the time of the hazing.

(3) "Pledging" means any action or activity related to becoming a member of an organization, including recruitment and rushing.

(4) "Postsecondary education institution", "education institution", and "institution" mean any postsecondary education institution in this state supported wholly or in part by public funds.

La R.S. 17:1801.1 – Hazing Education; Policies; New Student Orientation; Organizations

A. Not later than August 1, 2018, the Board of Regents shall develop and adopt a uniform policy on hazing prevention. The policy shall define hazing as defined in R.S. 17:1801. Each postsecondary education institution shall adopt the uniform policy developed by the Board of Regents. An institution may expand the definition of hazing to prohibit additional behaviors it determines may be dangerous but shall not otherwise amend the definition.

B. (1) Each new student shall be provided educational information on the dangers of and prohibition on hazing during the new student orientation process in the form of a handbook.

(2) In addition to the requirement provided in Paragraph (1) of this Subsection, beginning in the fall semester of 2019, each new student shall be provided educational information on the dangers of and prohibition on hazing during the new student orientation process either in person or electronically.

(3) If the student receiving the information required by Paragraphs (1) and (2) of this Subsection is a minor, the information shall also be provided to his parent or legal guardian.

C. Each organization as defined in R.S. 17:1801 shall, as a condition of operating at an institution, adopt the hazing prevention policy that the institution has adopted pursuant to Subsection A of this Section, which shall include possible institutional sanctions against the organization in the event of a reported or confirmed hazing incident, and a policy that prohibits hazing. Each organization shall provide annually at least two hours of hazing prevention education that includes education relative to such policies to all members, prospective members, and anyone who is employed by or volunteers with the organization. The education may be provided in person, electronically, or both. Each organization shall submit a report annually to the institution with which it is affiliated relative to the students, employees, and volunteers receiving such education evidenced by an attestation of such individuals receiving the education. The institution shall terminate the organization's operation on campus if it fails to comply with the provisions of the Subsection and shall submit a report to the House Committee on Education and Senate Committee on Education upon search termination.

Stop Campus Hazing Act

This act requires institutions of higher education (IHEs) that participate in federal student aid programs to report hazing incidents. It also renames the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act as the Jeanne Clery Campus Safety Act.

Specifically, the act requires each IHE to disclose hazing incidents that were reported to campus security authorities or local police agencies in its annual security report. The act defines the term *hazing* to mean any intentional, knowing, or reckless act committed by a person (whether individually or in concert with

other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization (e.g., a club, athletic team, fraternity, or sorority); and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the IHE or the organization, of physical or psychological injury.

Additionally, each IHE must include in its annual security report (1) a statement of current policies relating to hazing, how to report hazing incidents, the process used to investigate hazing incidents, and information on applicable laws on hazing; and (2) a statement of policy regarding prevention and awareness programs relating to hazing that includes a description of prevention programs.

Further, an IHE must develop a campus hazing transparency report that summarizes findings concerning any student organization found to be in violation of the IHE's standards of conduct relating to hazing. An IHE is not required to develop or update this report unless the IHE has a finding of a hazing violation.

Campus Hazing Transparency Report

Each institution must compile and publish on a prominent location of their public website a hazing transparency report that summarizes findings concerning any student organization found to be in violation of the institution's standards of conduct related to hazing. The report will include:

- The name of the student organization;
- A general description of the violation that resulted in a finding of responsibility; and
- Related dates (the date of the alleged incident, the date of the initiation of the investigation, the date the investigation ended with a finding, and the date the institution provided notice to the organization of the finding).

The Hazing Transparency Report is updated biannually. Tulane's Campus Hazing Transparency Report can be found under the section titled "Student Organization Conduct History." View it here: <https://conduct.tulane.edu/hazing-information-page>**Hazing Information Page | tulane.**

TULANE UPTOWN

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
CRIMINAL HOMICIDE						
Murder and Nonnegligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Negligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
SEX OFFENSES						
Rape	2022	30	28	4	0	0
Fondling	2022	12	6	1	0	0
Incest	2022	0	0	0	0	0
Statutory Rape	2022	0	0	0	0	0
Rape	2023	19	16	2	2	0
Fondling	2023	3	0	0	0	0
Incest	2023	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
Rape	2024	17	10	0	0	0
Fondling	2024	10	8	2	0	0
Incest	2024	0	0	0	0	0
Statutory Rape	2024	0	0	0	0	0
Robbery	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	2	1	0	0	0
Aggravated Assault	2022	2	2	3	3	2
	2023	3	1	7	2	0
	2024	5	2	3	0	1
Burglary	2022	11	4	4	2	0
	2023	6	3	0	0	0
	2024	5	3	0	0	0
Motor Vehicle Theft	2022	10	0	0	0	1
	2023	4	1	0	1	0
	2024	8	0	0	0	0
Arson	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0

TULANE UPTOWN

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
ADDITIONAL OFFENSES						
Dating Violence	2022	4	4	2	0	0
	2023	3	2	0	0	0
	2024	1	1	2	0	0
Domestic Violence	2022	2	0	0	0	0
	2023	1	1	0	0	0
	2024	6	3	0	0	0
Stalking	2022	30	12	0	0	0
	2023	12	2	0	0	0
	2024	24	9	0	3	0

Other Offenses	Year	ARREST				REFERRED FOR DISCIPLINARY ACTION			
		On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	On Campus	Student Housing	Noncampus Building or Property	Public Property
Liquor Law Violations	2022	2	1	0	0	0	0	1	0
	2023	1	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0
Drug Abuse Violations	2022	1	0	0	0	1	0	1	0
	2023	0	0	0	0	0	0	1	0
	2024	1	0	0	0	1	1	0	0
Weapons Law Violations	2022	1	0	0	4	1	1	0	0
	2023	1	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0

HATE CRIME STATISTICS UPTOWN

In 2022, the following hate crimes were reported on the Uptown Campus: (1) Intimidation motivated by sexual orientation in an On-Campus Residence Hall, (2) Intimidations motivated by sexual orientation bias on Non-Campus Property, (1) Intimidation motivated by Sexual Orientation bias on Public Property, (2) Intimidations motivated by national origin bias On Campus, (1) Intimidation motivated by race bias on Non-Campus Property, (2) Simple Assaults motivated by race bias on Non-Campus Property

In 2023, the following hate crimes were reported on the Uptown Campus: (1) Destruction/Damage/Vandalism of property motivated by religious bias on Public Property; (2) Aggravated Assault motivated by religious bias on Public Property; (4) Intimidation motivated by Religious bias On-Campus; (5)* Intimidation motivated by Sexual Orientation bias On-Campus; (1) Intimidation motivated by Racial bias on Public Property

There were no (0) reported hate crimes on the Uptown campus in 2024

* This statistic was corrected on October 2, 2024. 8 instances of intimidation motivated by sexual orientation bias were previously listed when in fact there were 5.

TULANE DOWNTOWN

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
CRIMINAL HOMICIDE						
Murder and Nonnegligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Negligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
SEX OFFENSES						
Rape	2022	0	0	0	0	0
Fondling	2022	5	0	0	0	0
Incest	2022	0	0	0	0	0
Statutory Rape	2022	0	0	0	0	0
Rape	2023	1	1	0	0	0
Fondling	2023	0	0	0	0	0
Incest	2023	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
Rape	2024	1	1	0	0	0
Fondling	2024	2	0	0	0	0
Incest	2024	0	0	0	0	0
Statutory Rape	2024	0	0	0	0	0
Robbery	2022	1	0	0	1	0
	2023	1	0	0	3	0
	2024	1	0	0	0	0
Aggravated Assault	2022	1	0	0	1	0
	2023	1	0	0	2	0
	2024	5	0	1	8	0
Burglary	2022	1	0	1	0	0
	2023	3	0	0	0	0
	2024	3	0	0	0	0
Motor Vehicle Theft	2022	0	0	0	1	0
	2023	12	0	0	19	0
	2024	1	0	0	2	0
Arson	2022	0	0	0	0	0
	2023	0	0	0	1	0
	2024	0	0	0	0	0

TULANE DOWNTOWN

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
ADDITIONAL OFFENSES						
Dating Violence	2022	1	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Domestic Violence	2022	1	0	0	0	0
	2023	1	0	0	2	0
	2024	3	1	0	4	0
Stalking	2022	10	2	1	1	0
	2023	2	1	0	0	0
	2024	4	1	0	0	0

Other Offenses	Year	ARREST				REFERRED FOR DISCIPLINARY ACTION			
		On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	On Campus	Student Housing	Noncampus Building or Property	Public Property
Liquor Law Violations	2022	0	0	0	0	0	0	0	0
	2023	0	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0
Drug Abuse Violations	2022	1	0	0	0	0	0	0	0
	2023	3	0	0	3	0	0	0	0
	2024	2	0	0	0	0	0	0	0
Weapons Law Violations	2022	1	0	0	0	0	0	0	0
	2023	1	0	0	0	0	0	0	0
	2024	4	0	1	1	0	0	0	0

HATE CRIME STATISTICS DOWNTOWN

In 2022, the following hate crimes were reported on the Downtown Campus: (1) Vandalism motivated by religious bias

There were no (0) reported hate crimes on the Downtown campus in 2023

There were no (0) reported hate crimes on the Downtown campus in 2024

THE TULANE NATIONAL PRIMATE RESEARCH CENTER

Originally opened in 1964 as the Delta Regional Primate Center, the Tulane National Primate Research Center is situated on 500 acres of land in Covington, Louisiana, approximately forty miles north of New Orleans. Over the past 60 years, the primate center Research has grown to meet the research needs for our nation's most pressing human health problems, and as a result has expanded its facilities, employees, and research programs.

Primary research interests include developing vaccines, treatments, and diagnostic tools for infectious diseases such as AIDS, COVID-19, Lyme disease, tuberculosis and emerging infectious diseases.

Research at the Tulane National Primate Research Center focuses on understanding infectious and chronic diseases that require the use of the nonhuman primate model. The TNPRC has both biosafety level 2 and biosafety level 3 laboratories to accommodate various research needs and is the only National Primate Research Center with a Regional Biosafety Laboratory. Learn more about the Regional Biosafety Laboratory at the TNPRC.

The TNPRC is part of the Tulane University Health Sciences Center, which also includes the Tulane School of Medicine and the Celia Scott Weatherhead School of Public Health and Tropical Medicine. While our faculty members hold academic appointments within the School of Medicine, the School of Public Health and Tropical Medicine, and the School of Science and Engineering, the Primate Center operates as a distinct entity within the Health Sciences Center. We collaborate closely with colleagues across the university while maintaining independent research programs, leadership, and infrastructure.

The Tulane National Primate Research Center has become a premier infectious disease research facility and one of the largest employers in St. Tammany Parish with over 350 employees and an annual statewide economic impact estimated at \$107.1 million a year.

Law Enforcement

Tulane University has TUPD officers onsite 24/7 at the TNPRC.

Reporting Crimes and Other Emergencies

If an incident of a criminal act, a crime in progress or an emergency arises, call 911 immediately and the Covington Police Department will respond.

Access to the Campus

The TNPRC buildings and grounds are available to employees and students of the center, as well as any invited guests or contractors with reason to enter for activities that are officially approved. Access to the building is controlled via individual keys and individual alarm system passcodes that provide the staff entrance after hours. Students do not have access to the building after hours.

Holiday hours or schedule changes will be posted at the building in advance.

Maintenance of the Campus

The facility and landscaping are maintained to minimize conditions that might pose a danger. Malfunctioning lights and other unsafe conditions should be reported to the center at 985-892-2040.

TNPRC Campus Community Education

There are Rape Aggression Defense (RAD) and Active Shooter Training programs offered at this campus. Crime Alerts are posted in the event of a serious incident that may pose a threat to the campus community and distributed to community members through text and email alerts.

Fire Evacuation Procedures

The fire alarms alert you to a potential hazard—please heed their warning. Use the nearest fire exit to leave the building immediately. Familiarize yourself with the exits in the building.

Summary

The policy of the Tulane National Primate Research Center is to provide easy access to authorized individuals. That access must be consistent with your safety, and the security of your property and that of the university. Questions, suggestions, or problems regarding these matters should be directed to the center's director, Jay Rappaport, PhD, at 985-871-6201. All other security-related policies and procedures described in the main university campus (uptown New Orleans) Annual Security report apply to this campus. The information from those sections is not repeated here because it applies to all university students, including those taking classes at the TNPRC Campus.

THE TULANE NATIONAL PRIMATE RESEARCH CENTER

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
CRIMINAL HOMICIDE						
Murder and Nonnegligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Negligent Manslaughter	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
SEX OFFENSES						
Rape	2022	0	0	0	0	0
Fondling	2022	0	0	0	0	0
Incest	2022	0	0	0	0	0
Statutory Rape	2022	0	0	0	0	0
Rape	2023	0	0	0	0	0
Fondling	2023	0	0	0	0	0
Incest	2023	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
Rape	2024	0	0	0	0	0
Fondling	2024	0	0	0	0	0
Incest	2024	0	0	0	0	0
Statutory Rape	2024	0	0	0	0	0
Robbery	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Aggravated Assault	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Burglary	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Motor Vehicle Theft	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Arson	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0

THE TULANE NATIONAL PRIMATE RESEARCH CENTER

Offense	Year	On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	Unfounded
ADDITIONAL OFFENSES						
Dating Violence	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Domestic Violence	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0
Stalking	2022	0	0	0	0	0
	2023	0	0	0	0	0
	2024	0	0	0	0	0

Other Offenses	Year	ARREST				REFERRED FOR DISCIPLINARY ACTION			
		On Campus	Student Housing (subset of On Campus)	Noncampus Building or Property	Public Property	On Campus	Student Housing	Noncampus Building or Property	Public Property
Liquor Law Violations	2022	0	0	0	0	0	0	0	0
	2023	0	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0
Drug Abuse Violations	2022	0	0	0	0	0	0	0	0
	2023	0	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0
Weapons Law Violations	2022	0	0	0	0	0	0	0	0
	2023	0	0	0	0	0	0	0	0
	2024	0	0	0	0	0	0	0	0

HATE CRIME STATISTICS THE TULANE NATIONAL PRIMATE RESEARCH CENTER

There were no (o) hate crimes reported on the TNPRC campus in 2024

There were no (o) hate crimes reported on the TNPRC campus in 2022

In 2023, the following hate crimes were reported on the TNPRC Campus: (2) Intimidation motivated by race On-Campus

ANNUAL FIRE SAFETY REPORT

Fire Safety Report Overview

The Higher Education Opportunity Act of 2008 (HEOA) requires all academic institutions with on-campus student residential facilities to develop and publish an annual fire safety report. The following report includes the information required by the HEOA, as it relates to the Tulane University campuses. TUPD publishes this Fire Safety Report in conjunction with the Annual Security Report. The Fire Safety Reports contains information with respect to the fire safety practices and standards for Tulane. The Fire Safety Report contains the following information.

- Fire statistics for each on-campus student housing facility.
- Description of the fire safety system for each on-campus student housing facility.
- Number of fire drills held during the previous calendar year.
- Institutional policies/rules regarding portable electrical appliances, smoking and open flames in on-campus student housing facilities.
- Procedures for student housing facility evacuation.
- Policies for fire safety education and training programs provided to students and employees, including procedures students and employees should follow in case of a fire.
- List of the titles or organizations to which fires should be reported.
- Plans for future improvements.

Definition of Terms (the following terms are defined in CFR 668.49(a)):

Cause of Fire: The factor or factors that give rise to a fire. The causal factor may be, but is not limited to, the result of an intentional or unintentional action, mechanical failure or act of nature.

Fire: Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.

Fire Drill: The supervised practice of a mandatory evacuation of a building for a fire.

Fire-related Injury: Any instance in which a person is injured as a result of a fire, including an injury sustained from a natural or accidental cause while involved in fire control, attempting rescue or escaping from the dangers of the fire. The term “person” may include students, faculty, staff, visitors, firefighters, or any other individuals.

Fire-related Death: Any instance in which a person is killed as a result of a fire, including death resulting from a natural or accidental cause while involved in fire control, attempting rescue or escaping from the dangers of a fire; or dies within one year of injuries sustained as a result of the fire.

Fire Safety System: Any mechanism or system related to the detection of a fire, the warning resulting from a fire or the control of a fire. This system may include sprinkler systems or other fire extinguishing systems; fire detection devices; standalone smoke alarms; devices that alert one to the presence of a fire, such as horns, bells or strobe lights; smoke-control and reduction mechanisms; and fire doors and walls that reduce the spread of a fire.

Value of Property Damage: The estimated value of the loss of the structure and contents, in terms of the cost of replacement in like kind and quantity. This estimate should include contents damaged by fire, and related damages caused by smoke, water and overhaul; however, it does not include indirect loss, such as business interruption.

2024 TULANE UNIVERSITY HOUSING SAFETY REPORT

Aron Student Residence is a four building, three-story student housing complex. It is protected by sprinkler system and fire alarm system. In addition to those systems there are also extinguishers and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Butler House is an eight-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Décou-Labat Residence is a four building, four-story student housing complex. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Deming Pavilion is an eight-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also extinguishers and AEDs accessible to the buildings residence. In 2024, there were (2) fire drills, zero fires and zero fatalities.

Greenbaum House is a six-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

JL House is a three-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Lake Hall is a seven-story housing building which opened June 2023. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the building's residents. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Mayer Residence is a four-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Monroe Hall is a twelve-story student housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

River Hall is a five-story housing building which opened June 2023. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the building's residents. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Sharp Hall is a seven-story housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Thirteen15 Gravier is a 12-story housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there was (1) fire drill, zero fires and zero fatalities.

Wall Residential College is a five-story housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Warren House is a three-story housing building. It is protected by a fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

Weatherhead Residential College is a five-story housing building. It is protected by sprinkler system, fire pump, and fire alarm system. In addition to those systems there are also hood suppression systems, extinguishers, and AEDs accessible to the buildings residence. In 2024, there were (4) fire drills, zero fires and zero fatalities.

For information on fire statistics, please see the table, Fires in Residential Facilities – 2024, which is included in this report. This data has been reported as per Campus, Residential Facilities, Total Fires in Each Building, Date of Notification, Date of Incident, Time of Incident, Cause of Fire, Number of Injuries that Required Treatment at a Medical Facility, Number of Deaths Related to a Fire and Value of Property Damage Caused by Fire.

A description of the fire safety systems in each residential facility defined as on-campus student housing facility can be found in the table, Fire Safety Amenities in Residential Facilities – 2024 which is included in this report. The data has been listed by Campus, Residential Facilities, Fire Alarm Monitoring Done by TUPD, Partial Sprinkler System, Full Sprinkler System, Smoke Detection, Fire Extinguishers, Evacuation Plans Posted and Number of Fire Drills Held. TUPD refers to the Tulane University Police Department.

The number of regular, mandatory, supervised fire drills held in 2022, 2023 and 2024 are noted by campus and building name for each residential facility in the table, Fire Safety Amenities in Residential Facilities - 2024. This data can be found under the columns labeled, “Number of Fire Drills Held (in 2022, 2023 and 2024).”

Policies or rules on portable electrical appliances in the residential facilities have been developed by Housing and Residence Life (HRL), applicable for the uptown campus and distributed under HRL Community Living Standards. Students may have the following electrical appliances in their rooms: computer, telephone, hot pot or coffee maker, camera, alarm clock, study lamp (no halogen), iron with auto shut-off, can opener, stereo and television and university-provided microwave and refrigerator. The use of non-approved appliances in residential communities’ rooms is prohibited. These include but are not limited to the following electrical appliances: halogen lamps, octopus lamps, open coil heaters and cooking elements, satellite dishes, grills, hot plates, deep fat fryers, electric griddles, toaster ovens, non-

university provided microwaves and refrigerators, non-university installed A/C units and ceiling fans. Exceptions to this policy include Aron Residences, where a microwave is not provided by the university. Students may bring their own microwave for their apartment. Additionally, in rare cases, special approval may be granted to students to bring an additional small refrigerator for their room if approved by the Goldman Center for Student Accessibility.

Hoverboards (i.e., electronic skateboards) are prohibited inside university facilities, buildings or on university shuttles as indicated by the Office of Insurance and Risk Management.

As of August 2014, the university has become completely tobacco and smoke free, eliminating all tobacco use on university property. Tobacco use is prohibited in all campus buildings and outside areas. TUPD is responsible for the enforcement of this policy, which can be found at <https://campushealth.tulane.edu/policies/tobacco-smoke-free-campus-policy>. HRL is responsible for enforcing and implementing sanctions to occupants in residence halls to include dormitories and other student residential facilities such as apartments.

With regards to the policy on open flames in student housing facilities, the HRL Community Living Standards prohibit any open flame source or flammable liquid, candles, incense, kerosene lamps, hookahs and grills inside these locations. Propane gas or tanks are prohibited in the residence halls as per university policy and as per the Louisiana Office of the State Fire Marshal.

Procedures for student housing evacuation in the case of a fire can be found in the HRL Community Living Standards, Emergency Evacuation and Response Procedures – HRL and in the Emergency Action Plans (EAPs). The EAPs have been developed for each building by the Office of Environmental Health and Safety (OEHS). Students should exit a building as soon as a fire alarm sounds. They are to use the nearest exit, report to the designated assembly area outside the building, and remain at least 100 feet from the building. They must not go back into the building until TUPD has indicated the “All Clear” signal. In the case of inclement weather, occupants will be moved indoors. All exits are to remain unobstructed at all times. Occupants must not use the elevators for emergency evacuation. Resident Advisors and other staff members will assist with evacuation.

In the event of a fire, employees and students should also follow the procedures in the Emergency Action Plan (EAP) as developed for each building. They must evacuate their area using the nearest exit and go to the designated assembly area on the exterior of the building. Employees are to report to their supervisor or Departmental Safety Representative (DSR) to confirm that they have safely evacuated the building. Students are to report to their class instructors, supervisors, or Resident Advisors to confirm evacuation. All must remain at least 100 feet from the building. They may reenter the building only after the “All Clear” has been given by Tulane Police. They should not use the elevators for evacuation.

The policies on fire safety education and training programs provided to faculty, staff and students are as follows:

- Each student in the residential facilities at the start of the semester receives fire safety material to include a building guide, list of assembly areas and other fire safety information developed by the university.
- At the Deming Apartments, fire safety information in the form of NFPA pamphlets and other information developed by OEHS are distributed to the tenants. This includes displays in the hallways with fire safety material. A meeting is held each year with the tenants at which time fire safety information is reviewed.

- Fire drills are conducted throughout the semester as required by the Louisiana Office of the State Fire Marshal and these are critiqued. Areas for improvement are discussed at the end of each drill with the students and staff who participate in the drills.
- Each October OEHS distributes fire safety pamphlets from the NFPA and operates Fire Safety Exhibition booths on the campuses during Fire Prevention Week (FPW). This also includes training on the use of portable fire extinguishers for faculty, staff, students and visitors.
- Each department including HRL is required to select a Departmental Safety Representative (DSR). That person serves as a representative for their department and as liaison with OEHS. These representatives must attend meetings, coordinate inspections of their work areas and coordinate safety training. Such training involves fire safety.
- Training on the use of portable fire extinguishers is available to the DSRs. Such training is mandatory annually for staff of TUPD and Facilities Management and Campus Development (FMCD).
- Through HRL, fire safety sanction meetings are held as needed with students who violate fire safety rules.

To report a fire, dial 911 or call TUPD at 504-865-5911 (or simply 55911 from a campus phone) uptown and 504-988-5555 (or simply 85555 from a campus phone) downtown. For further information, please see the EAPs written by OEHS for each building. These are available at the OEHS website.

Portable fire extinguishers have been installed in all the TUPD vehicles. These extinguishers are available to police officers who serve as First Responders to all fire emergencies. They now have an extinguisher readily available for their use. Also, all TUPD Officers receive annual hands-on training on how to use a portable fire extinguisher.

The following are Plans for Future Improvement in Fire Safety in the residential facilities which are being considered and/ or have been initiated: Fire Packs are being developed by the Fire and Safety Workgroup with the assistance of FMCD, HRL, TUPD and OEHS. These will be placed in each of the residential facilities to include all dormitories and apartments. These will provide building information to the fire department upon their arrival in the case of a fire in a residential facility.

The Fire Log, which includes data for fires in the on-campus student housing facilities, can be viewed at <https://publicsafety.tulane.edu/daily-crime-log>. It is maintained by TUPD. Entries or an addition to an entry to the log will be made by TUPD within two business days of receipt of the information on fires in the on-campus student housing facilities.

2024 TULANE UNIVERSITY HOUSING SAFETY CHART

Building Name	Fire Sprinkler		Fire Alarm System					Hood Supression Systems	Extinguishers	AEDs	2024 Fire Drills	2024 Fires	2024 Fatalities from Fires
	System	Pump	System	Smoke Det.	Duct Det.	Pull Stations	EVAC Devices						
Aron Student Residences #98	X		X	X	X	X	X	X	X	X	4	0	0
Butler House #52	X	X	X	X	X	X	X	X	X	X	4	0	0
Décou-Labat Residences #96	X	X	X	X	X	X	X	X	X	X	4	0	0
Deming Pavilion	X	X	X	X	X	X	X		X	X	2	0	0
Greenbaum House #71	X	X	X	X	X	X	X	X	X	X	4	0	0
Lake Dorm	X	X	X	X	X	X	X	X	X	X	4	0	0
JL House #75	X	X	X	X	X	X	X	X	X	X	4	0	0
Mayer Residences #55	X	X	X	X	X	X	X	X	X	X	4	0	0
Monroe Hall #38	X	X	X	X	X	X	X	X	X	X	4	0	0
River Dorm	X	X	X	X	X	X	X	X	X	X	4	0	0
Sharp Hall #42	X	X	X	X	X	X	X	X	X	X	4	0	0
Thirteen5 Gravier	X	X	X	X	X	X	X	x	X	X	1	0	0
Wall Residential College #46	X	X	X	X	X	X	X	X	X	X	4	0	0
Warren House #56			X	X	X	X	X	X	X	X	4	0	0
Weatherhead Residential College #59	X	X	X	X	X	X	X	X	X	X	4	0	0

IMPORTANT PHONE NUMBERS

Tulane University Police Department (Uptown)

504-865-5911 (emergency)

504-865-5381 (non-emergency)

Tulane University Police Department (Downtown)

504-988-5555 (emergency)

504-865-5381 (non-emergency)

New Orleans Police Department

911

Covington Police Department

911

Clery Act Coordinator

504-988-9898

Human Resources

504-865-4748

Student Resources & Support Services

504-314-2160

Title IX Coordinator

504-865-5611

Office of Institutional Equity

504-862-8083



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