



INSTITUTE FOR DOCTORAL STUDIES IN THE VISUAL ARTS

CAMPUS SAFETY & SECURITY REPORT
2025

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IDSVA is committed to protecting the safety of our students, faculty, and staff during residencies. The Director of Administration, Amy Schuessler, is responsible for collecting crime reports for specific residency locations (e.g., Spannocchia Castle, hotels, and classrooms in New York, Athens, Berlin, etc.) during the residency days and reporting the results in this Campus Safety & Security Report. Crime statistics are gathered from student, faculty, and staff reports of any crimes, and from requests made to local law enforcement agencies. This annual report is prepared by Amy Schuessler, Director of Administration. The report is emailed to all IDSVA students, faculty, and staff, and can also be found on the IDSVA website: <http://www.idsva.edu/policies-procedures>

How to Report Criminal Offenses that Occur During a Residency

Gabriel Reed, Interim Director of the School, and Amy Schuessler, Director of Administration, are the designated Campus Security Authorities (CSA). At least one Campus Security Authority, or an appointed representative, will attend every residency. If a crime of a non-emergency nature occurs during an IDSVA residency, students should report that crime to one of the Campus Security Authorities, who can then assist the student in reporting the crime to local law enforcement authorities, if the student wishes to do so. Members of the IDSVA community should report any crimes to the CSA if the victim is unable to do so. Any crime of an emergency nature should be first reported to local law enforcement in order to receive immediate help, as IDSVA does not have its own campus police.

IDSVA students, faculty, and staff are encouraged to report all crimes and public safety related incidents to one of the Campus Security Authorities in a timely manner. Crimes should be reported to IDSVA to ensure inclusion in the annual crime statistics and to aid in providing timely warning notices to the community, when appropriate. If you are a victim of a crime and do not want to pursue action within IDSVA or the criminal justice system, you may still want to consider making a confidential report to a Campus Safety Authority, so that it may be reported in the annual crime statistics. In such cases, the report will be kept entirely confidential and will be disclosed only as a statistic.

Make reports in-person, by phone, or by email to a Campus Security Authority

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Timely Warning Policy

In the event that a situation arises at a residency location that, in the judgment of the Campus Security Authorities, constitutes an ongoing or continuing threat to the IDSVA community, a residency-wide “timely warning” will be issued. The warning will be issued as soon as pertinent information is available. One or both (working together) of the Campus Security Authorities will determine what information should be conveyed in the

warning and will initiate the notification process. The timely warning will be issued through IDSVA e-mail and may also be issued through text messages and/or cell phone calls. The timely warning will be distributed to all IDSVA students, faculty, and staff who are present at the residency.

Anyone with information warranting a timely warning should report the circumstances to a Campus Security Authority by phone, email, or in person.

Emergency Notification Policy

In the event that a situation arises at a residency location that, in the judgment of the Campus Security Authorities, constitutes a significant emergency or dangerous situation involving an immediate threat to the IDSVA community, a residency-wide “emergency notification” will be issued immediately. One or both (working together) of the Campus Security Authorities will determine what information should be conveyed in the warning and will initiate the notification process. The warning will be issued through IDSVA e-mail and may also be issued through text messages and/or cell phone calls. The emergency warning will be distributed to all IDSVA students, faculty, and staff who are present at the residency. The emergency notification will include instructions for appropriate action. The first priorities in an emergency situation are to assist the victim(s) and contain and respond to the emergency. The emergency notification will not be sent if that action would compromise the response to the first priorities.

Anyone with information warranting an emergency notification should report the circumstances to a Campus Security Authority, by phone, email, or in person.

Security Awareness

Every residency begins with a safety orientation with information pertinent to the location, and strategies for personal safety and theft prevention. Prior to the orientation, students will be asked to share their cell phone number with the group *if they are comfortable doing so*. The resulting list of cell phone numbers is distributed to everybody at the residency, and a group text thread is established to aid communication. Cell phone numbers for faculty and staff, as well as contact numbers for local emergency response, are posted to the residency planning and orientation materials.

IDSVA does not have any officially recognized student groups with off-campus locations, and therefore does not monitor student behavior in off-campus locations.

Drug and Alcohol Policy

IDSVA is sensitive to rising national concerns regarding undergraduate and graduate school drinking trends, which in the past several years appear to be rising to increasingly serious levels, resulting in serious health problems, accidental deaths, suicides, and the failed hopes and dreams of many who otherwise would have succeeded in their academic and professional aspirations. The misuse of both prescription and non-prescription drugs creates its own litanies of serious consequences, endangers the well-being of the abuser,

puts at risk the health and safety of the rest of the IDSVA community, and diminishes the over-all quality of the educational experience.

The Institute for Doctoral Studies in the Visual Arts will uphold all federal, state and local laws regarding alcohol and other drugs. The unlawful possession, use, consumption or distribution of alcohol and other drugs by students or employees as part of any IDSVA activity is prohibited. Federal law prohibits, among other things, the manufacturing, distributing, selling and possession of controlled substances as stated in Title 21 US Code 801 through 971. Alcohol or drug abuse during IDSVA intensive residencies is cause for probation or dismissal. “Abuse” of either drugs or alcohol includes, but is not limited to, the use of any such substance (a) that is illegal under the laws where it is possessed or ingested, (b) creates a risk to the health of the student or others, (c) is disruptive of the learning environment or (d) calls the reputation of IDSVA and those associated with it into disrepute.

Drug and Alcohol Abuse Prevention Programs

IDSVA requires all incoming students and employees sign the IDSVA Drug and Alcohol Policy, certifying that they have read and understood it.

IDSVA recognizes the need for assistance, intervention and educational programs for anyone who struggles with substance abuse. Students, faculty, and staff are encouraged to seek help through the following resources:

- Alcohol and Drug Abuse Hotline: 800-ALCOHOL
- [Alcoholics Anonymous](#)
- [Drug Abuse Effects & Programs](#): 877-734-6839
- [Cocaine Anonymous](#): 212-262-2463
- [Marijuana Anonymous](#): 800-766-6779
- [Narcotics Anonymous](#)
- National Cocaine Hotline: 800-COCAINE
- [Substance Abuse and Mental Health Services Administration](#): 877-SAMHSA-7

POLICY ON SEXUAL HARASSMENT AND SEXUAL VIOLENCE

IDSVA Policy

Harassment of individuals in the IDSVA community on the basis of race, color, sex, sexual orientation, religion, age, ancestry or national origin, or disability is strictly prohibited. Additionally, discrimination based on pregnancy, childbirth, termination of pregnancy, lactation, related medical conditions, or recovery from these conditions is strictly prohibited. Any verbal, written, or physical conduct that discriminates against or targets these protected characteristics is a violation of IDSVA’s policy and may constitute illegal discrimination under state and federal laws. The term “sexual orientation” under

Maine law means a person's "actual or perceived heterosexuality, bisexuality, homosexuality, sex characteristics, or gender identity or expression."

All students, employees and other individuals associated with IDSVA's programs are expected to refrain from all forms of harassment. Violations of this policy by members of IDSVA faculty or staff may result in termination of employment. Violations by students may result in discipline, up to and including expulsion from the program. Violations by other individuals will be addressed on a case-by-case basis.

Complainant and Respondent

Under this policy, the Complainant is the individual making the complaint. The Respondent is the individual accused of a violation of this policy.

Prohibited Conduct:

Sexual Harassment –

Quid Pro Quo Sexual Harassment occurs when an employee of IDSVA conditions the provision of an aid, benefit, or service of IDSVA on an individual's participation in unwelcome sexual conduct.

Hostile Environment Sexual Harassment occurs when unwelcome conduct is determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to IDSVA's education program or activity.

Non-Title IX Sexual Harassment –

Unwelcome conduct based on sex, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, gender, or gender identity or expression that is so severe and/or pervasive that it has the purpose or effect of unreasonably interfering with a person's employment, academic performance or participation in IDSVA's programs or activities, or creates a working, learning, program or activity environment that a reasonable person would find intimidating, hostile, or offensive.

Sexual Violence –

Sexual violence includes any non-consensual sexual contact or sexual intercourse; sexual exploitation (such as taking pictures of sexual activity without permission); coercing an individual to have sex; dating violence or domestic violence (intimate partner violence); or stalking behavior. For sexual activity to be "consensual," all parties must clearly communicate their willingness to engage in a particular activity through words and/or actions. Being under the influence of alcohol or drugs is not an excuse for sexual violence.

Dating Violence –

Dating violence is the use of physical violence, coercion, threats, intimidation or other forms of emotional, psychological or sexual abuse directed toward an individual, who is or has been in a social relationship of a romantic or intimate nature with the accused. It

includes behaviors that intimidate, manipulate, humiliate, isolate, frighten, coerce, threaten or physically injure the individual. A romantic or intimate relationship may exist whether the relationship is sexual or not. Dating violence can be a single act or a pattern of behavior, depending upon the severity of the conduct. The existence of a dating relationship shall be determined based upon the complainant's statement, as well as such factors as the length of the relationship, the type of the relationship and the frequency of interactions between the parties involved in the relationship.

Domestic Violence –

Domestic violence is the use of physical violence, coercion, threats, intimidation or other forms of emotional, psychological or sexual abuse directed toward a current or former spouse, intimate partner, person with whom one shares a child or a person who is cohabitating with or has cohabitated with the complainant as a spouse or intimate partner, or anyone protected from the accused's acts under the domestic or family violence laws of Maine. To categorize as domestic violence, the relationship between the complainant and the accused must be more than two people living together as roommates and must be the type of relationship as noted above.

Domestic violence includes behaviors that intimidate, manipulate, humiliate, isolate, frighten, coerce, threaten, or physically injure the individual. Domestic violence may be a single act or a pattern of behavior, depending upon the severity of the conduct.

Sexual Assault –

Sexual assault is an offense classified as a forcible or non-forcible sex act directed against another person without consent, including where the victim is incapable of giving consent. Specifically, this includes:

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

Criminal Sexual Contact (Fondling): The touching of the private body parts of another person for the purpose of sexual gratification and without consent, including instances where the victim is incapable of giving consent because of age or temporary or permanent mental incapacity.

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

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

Stalking –

Stalking is a course of unwanted and repeated conduct directed at an individual or group of individuals, designed for no legitimate purpose and which causes a reasonable person to be in fear for their safety or the safety of others or to suffer substantial emotional distress. Stalking can take many forms and may include conduct where 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.

Bullying –

Bullying is defined as repeated and/or aggressive conduct, including non-verbal conduct and speech, which is likely to intimidate, humiliate or intentionally hurt, control, silence, exclude, isolate, or diminish another person physically or mentally, regardless of whether that conduct is based upon their actual or perceived membership in a protected class.

Retaliation –

Retaliation is any materially adverse action taken against an individual because they were involved in the disclosure, reporting, investigation, or resolution of a report of Prohibited Conduct. Retaliation includes threats, intimidation, harassment, coercion, discrimination, violence, or any other conduct against any person by IDSVA, a student, or an employee or other person authorized by IDSVA to provide aid, benefit, or service under IDSVA's education program or activity, for the purpose of interfering with any right or privilege secured by this policy or by law, including Title IX or its regulations. Adverse action does not include perceived or petty slights, or trivial annoyances.

Actual Notice in Title IX Sexual Harassment Cases –

Upon receipt of actual notice of an allegation of Title IX sexual harassment, IDSVA must respond in a manner that is not deliberately indifferent, meaning not unreasonable under known circumstances. Actual notice is defined as written or oral notice from any source, including submission of a Formal Complaint Form, an informal report, or an anonymous reports or information, provided to the Complaint Coordinator or any IDSVA official with authority to institute corrective measures on behalf of IDSVA.

Responding in a manner that is not deliberately indifferent includes:

- Promptly contacting the complainant.
- Regardless of whether a Formal Complaint Form is filed, apprising the complainant of available supportive measures, including, but not limited to: academic adjustments; support and accommodations; counseling resources; housing resources; work schedule adjustments; increased security; and no-contact orders.
- Providing the complainant with an explanation of the grievance process and how a Formal Complaint Form can be filed.

Student Amnesty –

The health and safety of every IDSVA student is of the utmost importance. IDSVA recognizes that students who have been drinking and/or using drugs (whether voluntary or involuntary) at the time of the violence, including but not limited to dating violence, domestic violence, stalking or sexual assault, may be hesitant to report such incidents due to fear of potential consequences for their conduct. A bystander (witness) acting in good faith or a complainant acting in good faith, who discloses an incident of dating violence,

domestic violence, stalking or sexual assault to the Complaint Coordinator or law enforcement will not be subject to student conduct action for violations of alcohol or drug use occurring at or near the time of the commission of the dating violence, domestic violence, stalking or sexual assault.

False Complaints –

A complainant who knowingly makes false allegations against a member of the IDSVA community in bad faith will be subject to disciplinary action. An inquiry into a false complaint may be resolved through a separate investigation.

Emergency Removals –

During the proceeding, the respondent can be removed from an educational program or activity if:

- After conducting an individualized safety and risk analysis, there is a determination that the respondent poses an immediate threat to the physical health or safety of an individual.
- The threat must arise from the allegations of sexual harassment.
- The respondent must have the opportunity to challenge the removal immediately thereafter.
- Employee respondents can be placed on administrative leave.

Confidentiality

When a student reports any incident of sexual misconduct to any IDSVA employee, the employee will report such information to Amy Curtis, the Title IX Coordinator. The School will take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. IDSVA will need to determine what happened – including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a School employee will be shared only with people responsible for handling the School's response to the report. IDSVA employees will not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement.

Due to the low-residency structure of its programming, IDSVA does not provide counseling services.

Before a victim reveals any information to an IDSVA employee, the employee should ensure that the victim understands the employee's reporting obligations – and, if the victim wants to maintain complete confidentiality and anonymity, direct the victim to resources outside of IDSVA.

If the victim wants to tell the IDSVA employee what happened but also maintain confidentiality, the employee should tell the victim that the School will consider the

request, but cannot guarantee that the school will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the employee will also inform the Coordinator of the victim's request for confidentiality.

IDSVA employees will not pressure a victim to request confidentiality but will honor and support the victim's wishes, including for the School to fully investigate an incident. By the same token, employees will not pressure a victim to make a full report if the victim is not ready to.

Requesting Confidentiality

If a victim discloses an incident to an IDSVA employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the School must weigh that request against its obligation to provide a safe, non-discriminatory environment for all students, including the victim.

If IDSVA honors the request for confidentiality, a victim must understand that the School's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

Although rare, there are times when the School may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students.

IDSVA has designated the Title IX coordinator, Amy Curtis, to evaluate requests for confidentiality once an employee is on notice of alleged sexual violence.

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

- The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:
 - o whether there have been other sexual violence complaints about the same alleged perpetrator;
 - o whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
 - o whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;
 - o whether the sexual violence was committed by multiple perpetrators;
- whether the sexual violence was perpetrated with a weapon;
- whether the victim is a minor;
- whether the School possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
- whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of

drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead IDSVA to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, IDSVA will likely respect the victim's request for confidentiality.

If IDSVA determines that it cannot maintain a victim's confidentiality, IDSVA will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the School's response.

The School will remain ever mindful of the victim's well-being and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or IDSVA employees, will not be tolerated. IDSVA will also:

- assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance at the residency location or in their place of residence.
- provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and
- inform the victim of the right to report a crime to local law enforcement – and provide the victim with assistance if the victim wishes to do so.

IDSVA may not require a victim to participate in any investigation or disciplinary proceeding.

If IDSVA determines that it can respect a victim's request for confidentiality, the school will also take immediate action as necessary to protect and assist the victim.

IDSVA's Policy on Sexual Harassment and Sexual Violence is reviewed during the Policies & Procedures Orientation held for first-year students at an online orientation prior to their first residency. IDSVA does not offer counseling services for victims of sex offenses but will assist students in seeking counseling for sex offenses in the community where the student lives.

Student victims have the option to change their residency living situations after an alleged sexual assault, if such changes are reasonably available.

Complaint Procedure

The following procedure is intended to provide prompt and equitable resolution of complaints of Prohibited Conduct.

A. Making a Report

1. Students are strongly encouraged to notify IDSVA's Complaint Coordinator, **Amy Curtis, acurtis@idsva.edu, 207-879-8757**, if they believe a violation of this Policy has occurred. Faculty and staff are expected to report possible

violations of this Policy as soon as possible. An initial report may be made either in writing or orally. If preferable, a student may utilize the [IDSVA Title IX Formal Complaint Form](#). Instructions for the completion and submission of the Formal Complaint Form are included on the Form.

Note: In the event that the complaint is against the Complaint Coordinator, the report should be made to the President. If there is a complaint against the Complaint Coordinator or the President, the President of the Board of Trustees should be notified of the complaint. In such cases, the President of the Board of Trustees will handle the complaint and shall arrange with an outside investigator to investigate the complaint.

2. Students always have the additional option to make a report of sexual violence to law enforcement and will be assisted by the Complaint Coordinator in doing so, if desired.
3. Unless a Formal Complaint Form has been filed, the Complaint Coordinator will ask the complainant if they wish to make a formal complaint against the respondent. Once a formal report is made, the Complaint Coordinator may take interim measures to ensure the safety of the students and/or others. These interim measures – including, but not limited to: separating the parties; placing limitations or restrictions; no-contact orders; suspension; alternative workplace schedules; student residential housing adjustments; transportation or academic accommodations or adjustments – will depend on the precise nature and circumstances of the complaint. The school will also offer supportive measures, as appropriate, to restore or preserve a party's access to the school's education program or activity or provide support during a school's grievance procedures or the informal resolution process. Supportive measures cannot be unreasonably burdensome to a party and cannot be imposed for punitive or disciplinary reasons. Supportive measures include, but are not limited to: academic adjustments; support and accommodations; counseling resources; housing resources; work schedule adjustments; increased security; and no-contact orders, regardless of whether a formal complaint is filed.
4. When a complainant requests that their name or other identifiable information not be shared with the respondent or that no formal action be taken, IDSVA balances this request with its obligations to provide a safe environment for all members of the IDSVA community and to follow the principles of fundamental fairness that require notice and an opportunity to respond before any action is taken against a respondent. IDSVA will take reasonable steps to investigate and respond to the report consistent with the request for confidentiality or request not to pursue an investigation, but its ability to do so may be limited based on this request.
5. The Complaint Coordinator will inform the complainant in writing of the evidentiary standard (preponderance of the evidence), potential remedies and sanctions, and sources of counseling, advocacy and support. A sustained allegation under a preponderance of the evidence means that it is more likely than not that the Prohibited Conduct occurred.

6. If a report of misconduct under this policy indicates that there is a serious and/or continuing threat to the community, IDSVA may institute a school-wide warning to protect the health or safety of the community and/or an emergency removal. Such warnings will not include any identifying information about the complainant.
7. IDSVA will comply with FERPA, Title IX, the Clery Act and other applicable federal and Maine laws in reporting and responding to complaints.
8. Students and others will not be retaliated against for making a complaint or participating in an investigation. Retaliation is illegal under federal and Maine laws, and any retaliation will result in disciplinary measures.
9. The Complaint Coordinator will provide adequate notice to the parties of the allegations, dismissal, delays, meetings, proceedings, and determinations.
10. The complainant and respondent will be treated in a fair and equitable manner.
11. There will be a presumption that the respondent is not responsible for the alleged sex discrimination until a determination is made at the conclusion of IDSVA's grievance procedures.
12. If the Complaint Coordinator has a conflict of interest or bias for or against either the complainant or respondent, the investigation will be handled by another employee appointed by the President or by an outside investigator.
13. Students are encouraged to utilize this complaint procedure. However, students are hereby notified that they also have the right to report complaints to the Maine Human Rights Commission, State House Station 51, Augusta, ME 04333 (telephone: 207-624-6290) and/or to the federal Office for Civil Rights, U.S. Department of Education, 400 Maryland Ave, SW, Washington, D.C. 20202-1475, 202-453-6020, OCR.DC@ed.gov.

B. Complaint Handling

1. The Complaint Coordinator shall meet with the complainant and make an initial assessment of the alleged conduct, including whether any interim measures, supportive measures, and/or assistance to the complainant are necessary.
2. The Complaint Coordinator must dismiss a formal complaint of Title IX sexual harassment if:
 - a) The alleged conduct does not meet the above definition of Title IX sexual harassment.
 - b) The alleged conduct did not occur in IDSVA's education program or activity.

The Complaint Coordinator may dismiss a formal complaint of Title IX sexual harassment if:

- a) The complainant informs the Complaint Coordinator or designee in writing that they wish to withdraw the complaint;

- b) The respondent is no longer enrolled or employed at IDSVA;
- c) There are circumstances that prevent IDSVA's ability to gather evidence sufficient to reach a determination.

Written notice of a dismissal of a complaint, along with an explanation for the dismissal, will be provided to both parties. Dismissal of a complaint is appealable and does not preclude IDSVA from addressing the alleged conduct under another IDSVA policy.

3. If the complainant discloses the name of the alleged respondent, the Complaint Coordinator shall contact them to inform them that a complaint has been received. In this initial contact, the Complaint Coordinator may keep the name of the complainant confidential. The Complaint Coordinator will inform the complainant in writing of the complaint, the evidentiary standard, potential remedies and sanctions, and sources of counseling, advocacy and support.
 - a) If the respondent accepts responsibility for misconduct at this point, disciplinary action will be taken based upon the facts and circumstances of the particular case.
4. If the respondent does not accept responsibility, the complainant shall be advised of the following options for proceeding:
 - a) If the complainant chooses to pursue a formal complaint, the Complaint Coordinator will personally investigate the complaint or will obtain the services of an outside investigator to investigate the complaint.
 - b) The complainant may opt out of pursuing a formal complaint. IDSVA may initiate an informal resolution at any time prior to reaching a determination regarding responsibility that does not require a full investigation and adjudication provided that:
 - Both parties are given written notice of the allegations and the requirements of the informal resolution process;
 - Both parties voluntarily agree in writing to participate in the informal resolution process;
 - At any time prior to agreeing to the informal resolution, a party has the right to withdraw from the informal resolution process and resume formal grievance proceedings;
 - IDSVA has discretion to utilize various forms of informal resolutions, including, but not limited to, mediation and restorative justice;
 - Informal resolution is not available in cases where an employee is alleged to have sexually harassed a student.
 - c) The complainant may request that IDSVA take no action at all. In such cases, the Complaint Coordinator will assess whether the request for no action can be honored within the broader context of IDSVA's obligation to maintain a safe community. In making this assessment, the Complaint Coordinator will

consider the likelihood that the incident will recur and/or put the larger community at risk and whether there have been other reports of misconduct under this policy naming the same alleged respondent.

C. Investigation

The following process will be used when investigations are conducted.

1. The investigator (or third-party investigator) will interview the complainant, the respondent, and any other witnesses or individuals with pertinent information, including witnesses named by the complainant and respondent. The complainant and respondent may be accompanied by a supporter at their interviews. Either the complainant or respondent may propose questions to be asked of the other party by the investigator. At the investigator's discretion, more than one interview may be conducted with individuals involved in the case.
2. Both parties will have an equal opportunity to present and access relevant and not otherwise impermissible evidence.
3. Both parties will have a reasonable opportunity to respond to relevant evidence.
4. The investigator will review any other relevant information, including information provided by IDSVA and/or law enforcement, as well as any physical evidence and relevant documents (including but not limited to social media posts, text messages, emails, etc.).
5. The investigation will be deemed complete when the investigator determines that all available and relevant information has been collected and questions resolved.
6. The investigator will prepare an investigation report and submit it to the Complaint Coordinator (or the President, if the investigation was conducted by the Complaint Coordinator). The investigator will make factual findings using a preponderance of the evidence standard whether the respondent committed one or more violations of this policy, and/or other IDSVA policies.
7. The investigation will be completed as soon as reasonably possible under all of the circumstances of the case or within one-hundred-and-twenty (120) business days, subject to limited extensions supported by good cause.
8. The complainant and the respondent will have an opportunity to review the investigation report. Within ten (10) business days of reviewing the report, the parties may submit personal impact statements of no more than five (5) typed pages for review by the Complaint Coordinator or the President. The complainant and the respondent will also have an opportunity to meet with the Complaint Coordinator to discuss their views about the report, within the ten (10) business day period for submitting personal impact statements.

D. Hearings in Title IX Sexual Harassment Cases

1. IDSVA will not issue a disciplinary sanction arising from an allegation of sexual harassment without holding a live/virtual hearing.
2. No party can waive the right to a live/virtual hearing. IDSVA may still proceed with the live/virtual hearing in their absence, including through any evidence gathered that does not constitute a “statement” of the absent party. A decision maker – generally, the Complaint Coordinator – may not draw an inference about the determination of responsibility based solely on a party’s absence from the live hearing or refusal to answer cross-examination questions.
3. The hearing will be conducted live/virtually in real time.
4. A decision maker will render the decision in the hearing.
5. Each party must be accompanied to the hearing by an advisor of their choice.
6. If either party does not have an advisor of choice, IDSVA will provide one free of charge to the party. There is no requirement that IDSVA provide an attorney or advisor of equal competence, as long as the advisor has received training.
7. The advisor can ask the party(ies) or witness(es) relevant questions on cross-examination.
8. The decision maker or hearing officer will determine whether the proposed question is relevant prior to the advisor being permitted to ask the question. The decision maker must explain any decision to exclude a question.
9. If a party or witness does not submit to cross-examination, the decision maker cannot rely on any statement they have made in determining responsibility, but may reach a determination regarding responsibility based upon evidence that does not constitute a “statement” by that party.
10. The standard of evidence used at the hearing is preponderance of the evidence, as defined above.
11. Complainants may not be asked questions about their sexual history, unless it goes directly to the issue of consent to the alleged conduct or the identity of the accused.
12. Privileged evidence of a party or witness may not be used during the hearing without the consent of the party or witness.
13. Both parties will receive a written outcome determination letter of the proceedings that includes findings of fact, conclusions on policy violations, rationale for the decision, as well as any disciplinary sanction or recommendations. The letter will also contain information about how to file an appeal.

14. Possible sanctions for respondents found responsible under the preponderance of the evidence standard are listed in the below section. In employee matters, disciplinary sanctions range up to and including termination of employment.
15. The Complaint Coordinator will maintain a record of the proceeding.

E. Sanctions

1. Disciplinary sanctions are imposed upon a respondent who has been found responsible and range from a warning up to and including expulsion/termination. The sanction will be based upon a consideration of all the circumstances, including, but not limited to: the nature and severity of the conduct; the respondent's disciplinary history; and previous allegations involving similar conduct.
2. Potential sanctions include, but are not limited to:
 - a) Official Warning
 - b) Educational Program/Project
 - c) Referral for Counseling
 - d) Loss of Privileges
 - e) Restricted Access
 - f) Revocation of Institutionally-Funded Scholarship and/or Grant
 - g) Relocation or Removal from Student Housing
 - h) Disciplinary Probation
 - i) Suspension
 - j) Expulsion

Appeals Procedures –

Both parties have the right to appeal:

1. The determination of responsibility at the hearing, and
2. Dismissals of a formal complaint or any allegations therein,

Appeals must be based upon one of the following grounds:

- a. A procedural irregularity occurred that affected the outcome of the matter;
- b. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; or
- c. The Complaint Coordinator, investigator, or decision maker had a conflict of interest or bias against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

All appeal requests must be sent in writing to the Complaint Coordinator within five (5) calendar days of being notified of the determination of responsibility or dismissal of the formal complaint. The opposing party will be notified in writing when an appeal is filed.

Each party can submit a written statement in support of or challenging the determination or dismissal of the complaint within ten (10) calendar days of the notification of the appeal. The Complaint Coordinator will then issue a written decision on the outcome of the appeal to both parties within ten (10) business days, which will be final.

If no appeal request is filed within five (5) calendar days, the determination of responsibility or dismissal of the complaint will be final.

Disclosures to Alleged Victims of Crimes of Violence or Non-forcible Sex Offenses.

IDSVA will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by IDSVA against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, IDSVA will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Sex Offender Registration

Since IDSVA is not a residential campus, we do not maintain or access a list of registered sex offenders who may be enrolled or employed at IDSVA.

Reporting and Compilation of Crime Statistics

IDSVA prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. This report is distributed to all IDSVA students and employees as a pdf via IDSVA email. The locations in the Crime Statistics Reporting Table refer to the specific locations leased by IDSVA (i.e., hotels and classroom space), during the days of the residency. Because IDSVA shares space with other groups and individuals at residency locations, reported statistics do not necessarily pertain to members of the IDSVA community. These statistics are gathered from any reports made to a Campus Security Authority, and from local law enforcement authorities. Not all local law enforcement authorities contacted for statistics responded to IDSVA's request.

2025 Crime Statistics Reporting Table

We have no crimes to report for the 2025 school year.

	Mexico City Jan 5-12	NYC April 24-27	Rome May 21-23	Spannocchia May 24-June 6	Athens May 29– June 6	Berlin June 6-11
Murder / Non-Negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses, Non-Forcible	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
VAWA Offenses – Domestic Violence	0	0	0	0	0	0
VAWA Offenses – Dating Violence	0	0	0	0	0	0
VAWA Offenses – Stalking	0	0	0	0	0	0
Arrests: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0
Arrests: Drug Abuse Violations	0	0	0	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0	0	0	0
Arrests: Liquor Law Violations	0	0	0	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0	0	0	0

Hate Crimes

There were no reported hate crimes in 2025

Unfounded Crimes

There were no unfounded crimes in 2025

2024 Crime Statistics Reporting Table

We have no crimes to report for the 2024 school year.

	Madrid Jan 5-7	Marrakech Jan 7-12	NYC April 18-22	Rome May 22-24	Spannocchia May 24-June 7	Athens May 31– June 7	Venice June 7-12
Murder / Non-Negligent Manslaughter	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0
Sex Offenses, Non-Forcible	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0
VAWA Offenses – Domestic Violence	0	0	0	0	0	0	0
VAWA Offenses – Dating Violence	0	0	0	0	0	0	0
VAWA Offenses – Stalking	0	0	0	0	0	0	0
Arrests: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0
Arrests: Drug Abuse Violations	0	0	0	0	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0	0	0	0	0
Arrests: Liquor Law Violations	0	0	0	0	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0	0	0	0	0

Hate Crimes

There were no reported hate crimes in 2024

Unfounded Crimes

There were no unfounded crimes in 2024

2023 Crime Statistics Reporting Table

We have no crimes to report for the 2023 school year.

	Mexico City Jan 9-15	Madrid May 18-21	Marrakech May 21-26	Rome May 24-27	Athens May 26 – June 7	Berlin May 26 – June 1	Spannocchia May 27- June 10
Murder / Non-Negligent Manslaughter	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0
Sex Offenses, Forcible	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0
Sex Offenses, Non-Forcible	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0
VAWA Offenses – Domestic Violence	0	0	0	0	0	0	0
VAWA Offenses – Dating Violence	0	0	0	0	0	0	0
VAWA Offenses – Stalking	0	0	0	0	0	0	0
Arrests: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0
Arrests: Drug Abuse Violations	0	0	0	0	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0	0	0	0	0
Arrests: Liquor Law Violations	0	0	0	0	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0	0	0	0	0

Hate Crimes

There were no reported hate crimes in 2023

Unfounded Crimes

There were no unfounded crimes in 2023