

# **DOUGLAS EDUCATION CENTER INSTITUTIONAL SEXUAL MISCONDUCT POLICY**

## **I. Nondiscrimination Statement and Statement of Policy**

Douglas Education Center prohibits any form of discrimination and harassment on the basis of sex, race, color, age, religion, national or ethnic origin, sexual orientation, gender identity or expression, pregnancy, marital or family status, medical condition, genetic information, veteran status, or disability in any decision regarding admissions, employment, or participation in a Douglas Education Center program or activity in accordance with the letter and spirit of federal, state, and local non-discrimination and equal opportunity laws, such as Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, The Age Discrimination in Employment Act, The Americans with Disabilities Act and ADA Amendments Act, The Equal Pay Act, and the Pennsylvania Human Relations Act. This policy supplements Douglas Education Center's Title IX Policy. If an incident of misconduct does not meet the criteria of a Title IX offense, it can be handled under this policy.

## **II. Definitions**

This policy uses the same definitions of Consent, Sexual Harassment, Sexual Assault, Dating Violence, Domestic Violence, Stalking, and Retaliation which are outlined in the School's Title IX Policy, and adds the following misconduct and definitions:

### **Sexual Assault –**

**1. Sexual Contact Without Consent:** Contact done directly or indirectly through clothing, bodily fluids, or with an object. It also includes causing or inducing a person, when consent is not present, to similarly touch or fondle oneself or someone else.

**Sexual Exploitation –** Taking sexual advantage of another person or violating the sexual privacy of another when consent is not present. This includes, but is not limited to, the following actions (including when they are done via electronic means, methods or devices):

1. Sexual voyeurism or permitting others to witness or observe the sexual or intimate activity of another person without that person's consent;
2. Indecent exposure or inducing others to expose themselves when consent is not present;
3. Recording or distributing information, images or recordings of any person engaged in sexual or intimate activity in a private space without that person's consent.
4. Prostituting another individual;
5. Knowingly exposing another individual to a sexually transmitted disease or virus without that individual's knowledge; and
6. Inducing incapacitation for the purpose of making another person vulnerable to non-consensual sexual activity.

**Sexual Harassment –** Defined in the School's Title IX Policy. This supplemental policy adds the additional definition:

Hostile Environment: The existence of a hostile environment can also be judged subjectively meaning the impacted individual felt the environment was hostile. A single, isolated incident of sexual harassment alone may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to create a hostile environment, particularly if the harassment is physical.

**Gender-Based Harassment**- Gender-based harassment occurs when a person harasses another based on their gender, sexual orientation, gender expression, or gender identity. This includes any act or the threat to commit an act of aggression, violence, or hostility and can be done verbally or non-verbally. The harassment can but does not need to be based on anything of a sexual nature.

### **III. Policy**

#### **A. Scope of Policy**

This policy applies to all on campus and off-campus conduct that is likely to have a substantial adverse effect on any member of Douglas Education Center community. There is no time limit for reporting allegations of sexual misconduct, however, Douglas Education Center strongly encourages the prompt reporting of sexual misconduct to allow Douglas Education Center to respond promptly and effectively. If the reported respondent is not a member of Douglas Education Center community or is no longer associated with Douglas Education Center at the time of the report or at the time a resolution process is initiated, Douglas Education Center may be unable to conduct an investigation or take disciplinary action.

Please see the **Reporting Sexual Misconduct** section below to make a report of misconduct, discrimination and/or harassment, or to file a complaint.

#### **B. Statement on Privacy and Confidentiality**

Douglas Education Center is committed to protecting the privacy of all individuals involved in a report of sexual misconduct. Every effort will be made to protect the privacy interests of all individuals involved. Privacy, confidentiality and privilege have distinct meanings under this policy.

Privacy generally means that information related to a report of sexual misconduct will only be shared with a limited circle of individuals, including individuals who “need to know” in order to assist in the review, investigation, or resolution of the report or to deliver resources or support services. While not bound by confidentiality or privilege, these individuals will be discreet and respect the privacy of all individuals involved in the process. All participants in an investigation of sexual misconduct, including advisors and witnesses, will be informed that privacy helps enhance the integrity of the investigation and protect the privacy interests of the parties and will be asked to keep any information learned in an investigation meeting or hearing confidential, to the extent consistent with applicable law.

Certain individuals are designated as having confidentiality. For reports made to employees designated with having confidentiality, Douglas Education Center will respect the reporting party’s expectations of privacy **to the extent permissible by law** while still ensuring compliance with other reporting obligations. For example, complaints involving minors are subject to mandatory reporting requirements.

Individuals designated as having confidentiality are required to report the nature, date, time and general location of an incident to the Title IX coordinator. Confidential resources will not share other information with the Title IX Coordinator or any other employee of Douglas Education Center without the express permission of the disclosing party. Confidential resources can provide information about Douglas Education Center and off-campus resources, support services and other options. As noted above, because of the confidential nature of these resources, disclosing information to or seeking advice from a confidential resource does not constitute a report or complaint to Douglas Education Center and will not result in a response or intervention by Douglas Education Center. A person consulting with a confidential resource may later decide to make a report to Douglas Education Center and/or law enforcement. The School has identified the following as Confidential Resources: Janelle Imbrescia: Director of Student Life, Ali Fleeman: Career Services and Alumni Coordinator, Dejah Gilgour: Tom Savini Instructor, Karen Nelson: Cosmetology Supervisor, Ellen Pritchard: Allied Health Program Coordinator, Heaven Caldwell: Coordinator of CDL Program, and Robert Tinnell: Director of George A. Romero's Filmmaking Program.

Communication with certain individuals may be privileged by operation of law and reports made to these individuals will not be shared with Douglas Education Center Title IX Coordinator or law enforcement except in very limited situations, such as when failure to disclose the information would result in imminent danger to the individual or to others or as otherwise required by law.

Douglas Education Center will generally respect a complainant's choice whether to report an incident to local law enforcement or initiate Douglas Education Center's sexual misconduct resolution process, unless Douglas Education Center determines that there is an overriding interest with respect to the safety or welfare of Douglas Education Center community. Where a report involves suspected abuse of a child (an individual under the age of 18 at the time of the incident(s) as reported), all Douglas Education Center employees and volunteers are required to notify Douglas Education Center police and the ChildLine run by the Pennsylvania Department of Human Services. All other members of Douglas Education Center community are strongly encouraged to report suspected child abuse to law enforcement or the ChildLine.

All Douglas Education Center proceedings are conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX of the Education Amendments of 1972 ("Title IX"), Violence Against Women Act (VAWA), state and local law, and Douglas Education Center policy. No information will be released from such proceedings, except as required or permitted by law and Douglas Education Center policy. Douglas Education Center may share non-identifying information about reports received in aggregate form, including data about outcomes and sanctions.

### **C. Prohibited Conduct**

Douglas Education Center prohibits the following forms of conduct:

1. Sexual Assault including Sexual Penetration Without Consent, Sexual Contact Without Consent and Statutory Sexual Assault
2. Sexual Harassment
3. Sexual Exploitation

4. Intimate-Partner Violence, including Dating Violence and Domestic Violence
5. Stalking
6. Gender-Based Harassment
7. Retaliation

This prohibited conduct can affect all genders, gender identities and sexual orientations. Some of these prohibited forms of conduct may also be crimes under Pennsylvania or federal law.

#### **D. Free Expression and Academic Freedom**

Douglas Education Center is firmly committed to free expression and academic freedom and to creating and maintaining a safe, healthy, and harassment-free environment for all members of its community. Sexual and Behavioral Misconduct, including retaliation, against members of Douglas Education Center are not protected expression nor the proper exercise of academic freedom. Douglas Education Center will consider principles of free expression and academic freedom in the investigation of reports of sexual misconduct or retaliation that involve an individual's statements or speech.

#### **E. Alcohol and Drug Use Amnesty**

The health and safety of every student at Douglas Education Center is of utmost importance. Douglas Education Center recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time sexual misconduct occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. Douglas Education Center strongly encourages students to report incidents of sexual misconduct. A witness to or individual who experience sexual misconduct, acting in good faith, who discloses any incident of sexual misconduct to Douglas Education Center officials or law enforcement will not be sanctioned under Douglas Education Center's code of conduct for violations of alcohol and/or drug use policies occurring at or near the time of the incident(s) of sexual harassment or sexual violence. Douglas Education Center may request the individual attend an approved alcohol or drug education program and without assessing any charges for such program. This amnesty provision also applies to student groups making a report of sexual misconduct. Amnesty does not preclude or prevent action by police or other legal authorities pursuant to relevant state or federal criminal statutes.

### **IV. Reporting**

#### **A. Reporting Options**

Any individual, including a third party, may make a report concerning misconduct.

Complainants and third-parties are encouraged to report misconduct as soon as possible to allow Douglas Education Center to respond promptly and effectively.

A person who has experienced misconduct under this policy, or a person who witnesses misconduct under this policy, has the right to simultaneously file a complaint with Douglas Education Center and to pursue a criminal complaint with law enforcement. Victims and witnesses of misconduct have the right to be assisted by Douglas Education Center in notifying law enforcement authorities of misconduct or they can decline to notify such authorities. Douglas Education Center may, however, have a statutory reporting obligation when it becomes aware of

certain factual allegations. Parties may also have options to file civil actions in court or with administrative agencies.

Douglas Education Center has designated the Title IX Coordinator to oversee complaints of sexual misconduct at Douglas Education Center. An individual who has experienced sexual misconduct has the right to choose whether to report the incident to Douglas Education Center, the Title IX Coordinator, or Sexual Misconduct Committee for investigation. These officials are trained to work with individuals who report sexual misconduct and have knowledge about resources and services, both on and off campus, including the availability of supportive measures.

Please call or email Douglas Education Center's Title IX Coordinator to set up a meeting if you have a complaint involving sexual misconduct. You can also call for general information.

The Title IX Coordinator, in consultation with the Sexual Misconduct Committee and others (as necessary), will conduct an initial assessment of the conduct, the reporting party's desired course of action, and the necessity for any supportive or interim measures to protect the safety of the complainant or the community. The goal is to eliminate any hostile environment. If a report of misconduct discloses a serious or immediate threat to the campus community, Douglas Education Center will issue a timely notification to the community to protect the health or safety of the community. The timely notification will not include any identifying information about the complainant.

Please Note: Title IX Coordinators are not a confidential source of support. While they will address your complaint with sensitivity and will keep your information as private as possible, confidentiality cannot be guaranteed.

**Please Also Note:** Making a report is different from filing a complaint. A report is defined as notification of an incident of sexual misconduct to the Title IX Coordinator by any responsible employee or reporting person. A report may be accompanied by a request for (1) supportive or interim measures; (2) no further action; (3) a request to initiate an informal resolution process; and/or (4) the initiation of the formal complaint process. Filing a complaint initiates the Douglas Education Center formal disciplinary process. (See Sexual Misconduct Resolution Process).

### **B. Electronic and Anonymous Reporting**

You may also file a complaint about sexual misconduct using the appropriate link below. While anonymous complaints are accepted, Douglas Education Center's ability to address misconduct reported anonymously is significantly limited.

Individuals may use <https://dec.edu/title9> to electronically file a report of sexual misconduct with Douglas Education Center.

Individuals may also file a report electronically by email to: [mcrosby@dec.edu](mailto:mcrosby@dec.edu).

### **C. Criminal Reporting Options**

Individuals wishing to pursue a criminal complaint may contact the Monessen Police Department at (724) 684-4620.

A complainant may seek resolution through Douglas Education Center's informal or formal resolution process. A complainant may also seek to initiate a criminal complaint, independent of or parallel with any resolution process of Douglas Education Center. Douglas Education Center's

policy, definitions, and burden of proof may differ from Pennsylvania criminal law. Neither law enforcement's decision whether to prosecute, nor the outcome of any criminal prosecution, is determinative of whether sexual misconduct has occurred under this policy. In cases where there is a simultaneous law enforcement investigation, there may be circumstances when Douglas Education Center's may need to temporarily delay its investigation while law enforcement gathers evidence. However, Douglas Education Center's will generally proceed with its investigation and resolution of a complaint even during the time of a pending law enforcement investigation.

#### **D. Reporting Obligations of Douglas Education Center**

All Douglas Education Center's officials, employees (including student employees), and volunteers are considered "responsible employees" under this policy and are obligated to report incidents of sexual misconduct of which they become aware to the Title IX Coordinator/designee, unless they serve in a role that makes such reports privileged or are recognized as providing a confidential resource (see Statement on Privacy and Confidentiality).

#### **E. Assessment and Timely Warnings**

The Title IX Coordinator/designee in consultation with the Sexual Misconduct Committee and others (as necessary) will conduct an initial assessment of the conduct, the reporting party's desired course of action, and the necessity for any interim measures or services to protect the safety of the complainant or the community. The goal is to eliminate any hostile environment. If a report of misconduct discloses a serious or immediate threat to the campus community, Douglas Education Center will issue a timely notification to the community to protect the health or safety of the community. The timely notification will not include any identifying information about the complainant.

### **V. Sexual Misconduct Resolution Process**

#### **A. Participant Roles**

1. A **complainant** is the person who has been impacted by an alleged policy violation and has chosen to participate in the resolution process.
2. A **respondent** is the person who is alleged to have violated Douglas Education Center policy.
3. **Parties** is a term that refers to the complainant and the respondent collectively.
4. A **witness** is a person who has knowledge related to specific aspects of a case and may have reported such aspects to the institution.
5. An **advisor** is a support person who may be present to provide support to a complainant or respondent throughout an investigation and/or hearing provided the choice of advisor does not unduly delay the process. Advisors may not speak, write, or otherwise communicate with investigators, conduct administrators, hearing panel members, or appeal reviewers on behalf of the party being advised. Each party is responsible for coordinating and scheduling with their choice of advisor.

All participants have the responsibility to be truthful with the information they share at all stages of the process. Any individual who knowingly or intentionally provides false information as part of a report or investigation under this policy may be subject to discipline. This provision does not

apply to a good faith report that is not substantiated or proven by a preponderance of the evidence.

### **B. Conflict of Interest**

Parties have the opportunity to raise the issue of a potential conflict of interest within two (2) days of being advised of the identity of the investigator, panel member, or appeal reviewer. The Title IX Coordinator/designee will determine whether a conflict of interest exists. No investigator, panelist, or appeal reviewer will make findings or determinations in a case in which they have a conflict of interest.

### **C. Burden of Proof**

The burden of proof refers to who has the responsibility of showing a violation has occurred. It is always the responsibility of Douglas Education Center to satisfy the burden of proof. The respondent does not have the burden to prove that a violation did not occur. Respondents may decide not to share their side of the story or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from Douglas Education Center and does not indicate responsibility. Additionally, the Sexual Misconduct Committee shall not make an adverse inference against a respondent for the respondent's refusal to participate in an investigation or hearing, nor will respondent's refusal to participate result in increased sanctions if the respondent is found responsible for the accusations.

### **D. Standard of Proof**

Douglas Education Center uses the preponderance of the evidence standard in investigations of complaints alleging sexual misconduct and any related violations. This means that the investigation determines whether it is more likely than not that a violation of the policy occurred.

### **E. Timeline for Resolution**

Douglas Education Center will resolve all cases in a prompt and timely manner, however, the timeline will vary based on the circumstances of the case, including breaks in the academic calendar, availability of the parties and witnesses, scope of the investigation, need for interim actions, and unforeseen or exigent circumstances. The parties will be periodically updated on the status of their case.

### **F. Outreach**

Upon receipt of a report of sexual misconduct, the Title IX coordinator/designee will provide resources and support information by contacting the potential complainant and offering an initial meeting between the reporting party and the Title IX coordinator/designee. The initial meeting is optional and the reporting party may decline. The purpose of the initial meeting is for the Title IX/designee to gain a basic understanding of the nature and circumstances of the report and provided information about resources, supportive measures, and resolution options to the reporting party

### **G. Initial Inquiry**

Douglas Education Center will conduct a preliminary inquiry to determine if the allegations, if true, would rise to the level of a violation of Douglas Education Center's Sexual Misconduct policy. The possible next steps include the following: (1) A decision to close the case when

insufficient evidence exists to move forward or because the allegation, even if proven, would not violate Douglas Education Center's Sexual Misconduct policy; (2) Informal Action (see below); or (3) Formal Resolution (see below).

## **H. Interim and Supportive Measures**

When Douglas Education Center becomes aware of an allegation of sexual misconduct and the complainant or other affected parties, including the respondent, request interim or supportive measures, Douglas Education Center will take appropriate supportive and interim measures to protect affected parties, to assist the parties, and to protect against retaliation. Douglas Education Center] may also take interim measures to protect the Douglas Education Center community at large.

1. Supportive Measures. The following are examples, but not an exhaustive list, of supportive measures:
  - a. Making appropriate changes to academic programs, including changes in class schedule, providing an academic tutor, or extending deadlines for assignments;
  - b. Providing the affected party with an escort to and from class or campus work location;
  - c. Providing information on available counseling services.
  - e. Assisting the affected party in obtaining medical and other services, including access to rape crisis centers;
  - f. Assistance with filing a criminal complaint and/or seeking an order of protection; and/or

Supportive measures will be individualized and appropriate based on the information available, making every effort to avoid depriving any student of their education or impacting employment. The measures needed by each party may change over time, and parties should communicate with Douglas Education Center throughout the resolution process to ensure the supportive measures are effective.

### 2. Interim Measures

- a. No Contact Orders - When respondent is a student employee or volunteer of the institution, the complainant has the right to request Douglas Education Center issued "no contact order" under which continued intentional contact with the complainant would violate this policy. No contact orders may be issued for both the complainant and the respondent, as well as other individuals as appropriate.
- b. Interim Suspension - In exceptional circumstances where it is determined that a respondent is a continuing threat to the health and safety of the community, Douglas Education Center may seek an emergency interim suspension of a student or take similar emergency measures against an employee, consistent with applicable Douglas Education Center policy and collective bargaining agreements. For students who are given an interim suspension, Douglas Education Center will convene a hearing within 10 working days, unless extenuating circumstances warrant an extension, in which case a hearing shall be provided at the earliest possible date.

### 3. Process for Review of Interim Measures



For students who are given an interim suspension, Douglas Education Center will convene a hearing within 10 working days, unless extenuating circumstances warrant an extension, in which case a hearing shall be provided at the earliest possible date.

b. For interim measures involving employees, Douglas Education Center will follow applicable requirements in Douglas Education Center policy and relevant collective bargaining agreements.

### **I. Informal Resolution**

Informal resolution involves a mutual agreement by the parties to resolve the matter by mutual agreement. Informal resolution may not be used when formal resolution is desired by a reporting party or where the Title IX Coordinator/designee has determined that Douglas Education Center needs to proceed with an investigation. Informal resolution may take place at any time prior to a decision being issued in a hearing or a respondent taking responsibility. The informal resolution process will be conducted by the Title IX Coordinator. Both the complainant and the respondent have the right to end the informal resolution process at any time. Any informal resolution must be acceptable to the complainant, the respondent, and the Title IX Coordinator.

If a resolution is reached, the complainant and the respondent shall be notified in writing, and the Title IX Coordinator will confer with appropriate parties to memorialize the agreed upon resolution and any consequences for non-compliance in a memorandum. This memorandum will be included in the respondent's student record. If no agreement is reached within a reasonable time, the Title IX Coordinator shall proceed with the formal resolution process.

Informal resolution does not result in findings related to responsibility.

### **J. Formal Resolution**

1. Notification to Respondent - If a case is referred for formal resolution, the respondent will be notified of the alleged misconduct and given an opportunity to respond. The notification will include the allegations, identities of the parties involved, the specific section(s) of Douglas Education Center policy allegedly violated, the precise conduct allegedly constituting the potential violation, and the date and location of the incident (if known). This notice will be given before any initial interview. Douglas Education Center may modify the list of policies allegedly violated based on additional information learned during investigation.

2. Acceptance of Responsibility - Prior to the conclusion of a sexual misconduct investigation, the respondent may elect to take responsibility for the prohibited conduct by contacting the Title IX Coordinator in writing. The Title IX Coordinator will issue a brief outcome determination summarizing the allegations and stating the respondent has accepted responsibility, and refer the matter to the appropriate office for sanctioning. Following the determination of sanctions, parties may appeal the sanctions but not the finding(s) of responsibility.

3. Investigation - For investigations of respondents who are employees Douglas Education Center will follow applicable requirements in Douglas Education Center's Title IX policy and relevant collective bargaining agreements. For investigations of respondents who are students Douglas Education Center will follow applicable requirements in Douglas Education Center's Title IX policy. During an investigation the Sexual Misconduct Committee will meet with witnesses recommended by both the respondent and complainant (if applicable), and gather evidence provided by both parties or other sources. Both parties will have the opportunity to review evidence gathered during the investigation.

4. Hearings- For hearings for respondents who are employees Douglas Education Center will follow applicable requirements in Douglas Education Center's Title IX policy and relevant collective bargaining agreements. For hearings for respondents who are students Douglas Education Center will follow applicable requirements in Douglas Education Center's Title IX policy. Both parties will be allowed to have witnesses at the hearing and be allowed to have an advisor of their choosing. This advisor could be a friend, family member, member of DEC's faculty or administration, a member of the clergy, or an attorney.

5. Sanctioning- For sanctions for respondents who are employees Douglas Education Center will follow applicable sanctions outlined in Douglas Education Center's Title IX policy. For sanctions for respondents who are students Douglas Education Center will follow applicable requirements in Douglas Education Center's policy.

Possible sanctions include:

- A permanent order of No Contact for both the complainant and respondent while on DEC property.
- A permanent change in academic situations for both the complainant and respondent (if possible).
- Education training/remediation plan for the respondent.
- Expulsion or termination of employment from Douglas Education Center.

## **K. Appeal**

The complainant or respondent may appeal the hearing outcome and/or sanction(s).

For appeals by parties who are employees Douglas Education Center will follow applicable requirements in Douglas Education Center policy and relevant collective bargaining agreements. For appeals by parties who are students Douglas Education Center will follow applicable requirements in Douglas Education Center's policy.

In the event sanctions were imposed, it shall be in the discretion of the Title IX Coordinator, Sexual Misconduct Committee, and the President whether the sanctions shall be implemented or stayed pending resolution of an appeal.

The limited grounds for appeal are as follows:

- New information that could affect the outcome of the matter and was not reasonably available through the exercise of due diligence at the time of the hearing below;
- A deviation from Douglas Education Center policy or procedures that materially affected the hearing outcome or sanctions; and
- The sanction is too harsh or too lenient.

## **VI. Rights/Responsibilities**

A. Reports and complaints have different meanings. An individual has a right to make a report of sexual misconduct to Douglas Education Center, which may be accompanied by request for supportive measures. An individual also has a right to make a complaint of sexual misconduct, which is a request to initiate Douglas Education Center's an informal resolution process or a formal disciplinary process, which includes an investigation and may proceed to a formal hearing.

B. Prior to the conclusion of a sexual misconduct investigation, the reporting party may request to withdraw the complaint by contacting the Title IX Coordinator/designee in writing. He or she

will determine whether to close the case or conclude the investigation without the complainant's continued participation.

C. An individual also has the right to report sexual misconduct to law enforcement, separate and apart from any report or complaint made to Douglas Education Center.

D. At the time a report is made, the reporting party does not have to decide whether to file a complaint or make a report of sexual misconduct to law enforcement.

E. An affected party has the right to request supportive measures from Douglas Education Center which may include interim contact restrictions.

F. The reporting party has the right to seek medical treatment to address physical and mental health and to preserve evidence.

G. A report may become a formal complaint, either initiated by the reporting party or Douglas Education Center depending on the outcome of the Title IX assessment. To file a complaint, please contact the Title IX Coordinator/designee.

## **VII. Related Information**

### **A. Local and National Supportive Resources**

**1. The National Sexual Assault Hotline 1-800-656-HOPE (4673)**

**2. The National Sexual Assault Online Hotline [online.rainn.org](http://online.rainn.org)**

**3. Local Sexual Assault Service Providers**

• **Blackburn Center**

(888) 832-2272

[www.blackburncenter.org](http://www.blackburncenter.org)

• **Pittsburgh Action Against Rape**

(866) 363-7273

[www.paar.net](http://www.paar.net)

• **The C.A.R.E. Center— STTARS Program**

(888) 480-7283

[www.sphs.org](http://www.sphs.org)

• **Center for Victims**

(866) 644-2882

[www.centerforvictims.org](http://www.centerforvictims.org)

### **B. Staff**

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**VIII. Revision History**

6/26/2020 8/1/2020