

September 2023

NECO | New England
College of Optometry

Annual Security Report 2023 *for data year 2022*

As required by the US Dept of Education and in compliance with 34 CFR 688.46, the
Jeanne Clery Act

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Introduction

New England College of Optometry's Annual Security Report is released by October 1st of each year. For purposes of this report, "College" refers to both New England College of Optometry ("NECO") and its clinical teaching affiliate, NECO Center for Eye Care. The report is issued in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, Title II of Public Law 101-542, as amended through 2008, as well as the Violence Against Women Act (Public Law 113-4). For further details, please refer to 34 CFR 668.46 and the related subsections found therein.

For the purposes of this document, the College Community consists of: internal and external faculty, staff, members of the corporation, students, independent contractors, patients, and visitors to the College's various properties.

The report includes the College's policies concerning campus safety and security, such as alcohol and drug use, crime prevention, the reporting of crimes, domestic violence, dating violence, sexual assault, stalking, and other matters.

The College's Annual Security Report also includes crime statistics for the previous three years on campus, on property owned or controlled by the College, and on public property within, or immediately adjacent to and accessible from, the campus. The College maintains crime statistics for its main campus, as well as two NECO Center for Eye Care clinics and clinical teaching facilities under lease or other occupancy arrangements:

Main Campus
New England College of Optometry
424 Beacon Street
Boston, MA 02115

Teaching Clinic and Clinical Training Center
NECO Center for Eye Care Commonwealth
930 Commonwealth Avenue
Boston, MA 02215

Teaching Clinic
NECO Center for Eye Care Roslindale
4199 Washington Street
Roslindale, MA 02131

The Office of Facilities Operations and Administration ("Operations") is responsible for the preparation of the Annual Security Report, including collecting crime statistics from Campus Security Authorities, the City of Boston Police Department Office of Research and Development, and the Brookline Police Department. Since the College does not maintain residence halls on or off campus, the statistics should not be relied upon for any reportable

events related to areas where students might reside, and a Fire Log, Annual Fire Safety Report, and Missing Student Notification Policy are not included in this report. NECO does not have any non-campus property.

By the deadline each year, all employees and enrolled students receive an email regarding the content and availability of the Annual Security Report. The email provides information regarding how to access the report via the NECO website and NECO's intranet ("the Portal"), and how to request a printed copy of the report as outlined below.

Prospective students and employees receive information regarding the availability and access to the report from Admissions and Human Resources, respectively.

Accessing the Report

The Annual Security Report 2023 is posted on the NECO website for public access, as well as the NECO Portal. The Report may be printed in its entirety at the following link on the NECO website:

<https://www.neco.edu/consumer-information/>

To request a printed copy by mail or for more information regarding campus safety, contact the Office of Facilities Operations and Administration at 617-266-2030 or email facilities@neco.edu.

Clery Geography

Only crimes committed in the College's Clery Geography are included in the Annual Security Report.

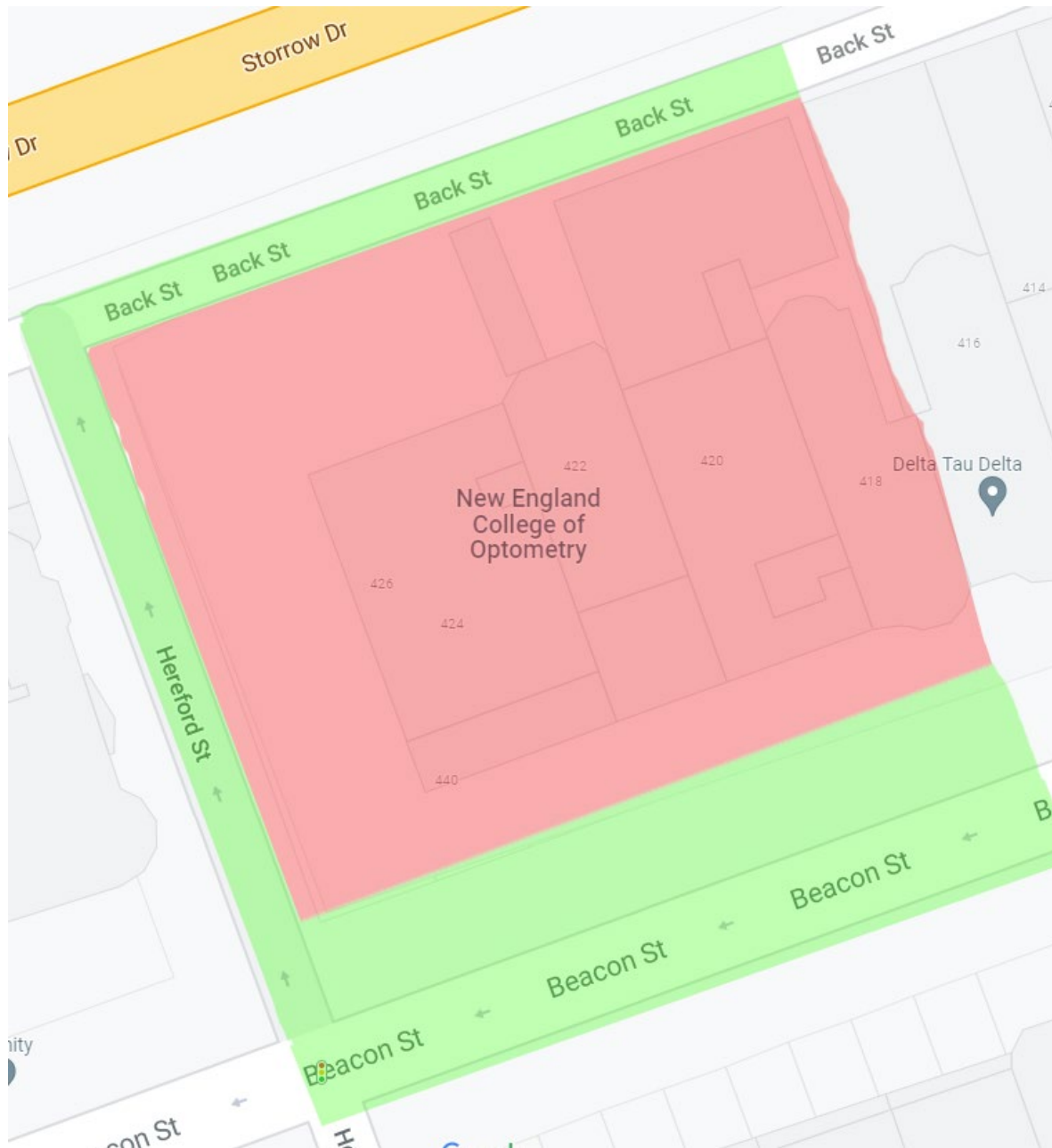
Maps Key:

Red: On Campus

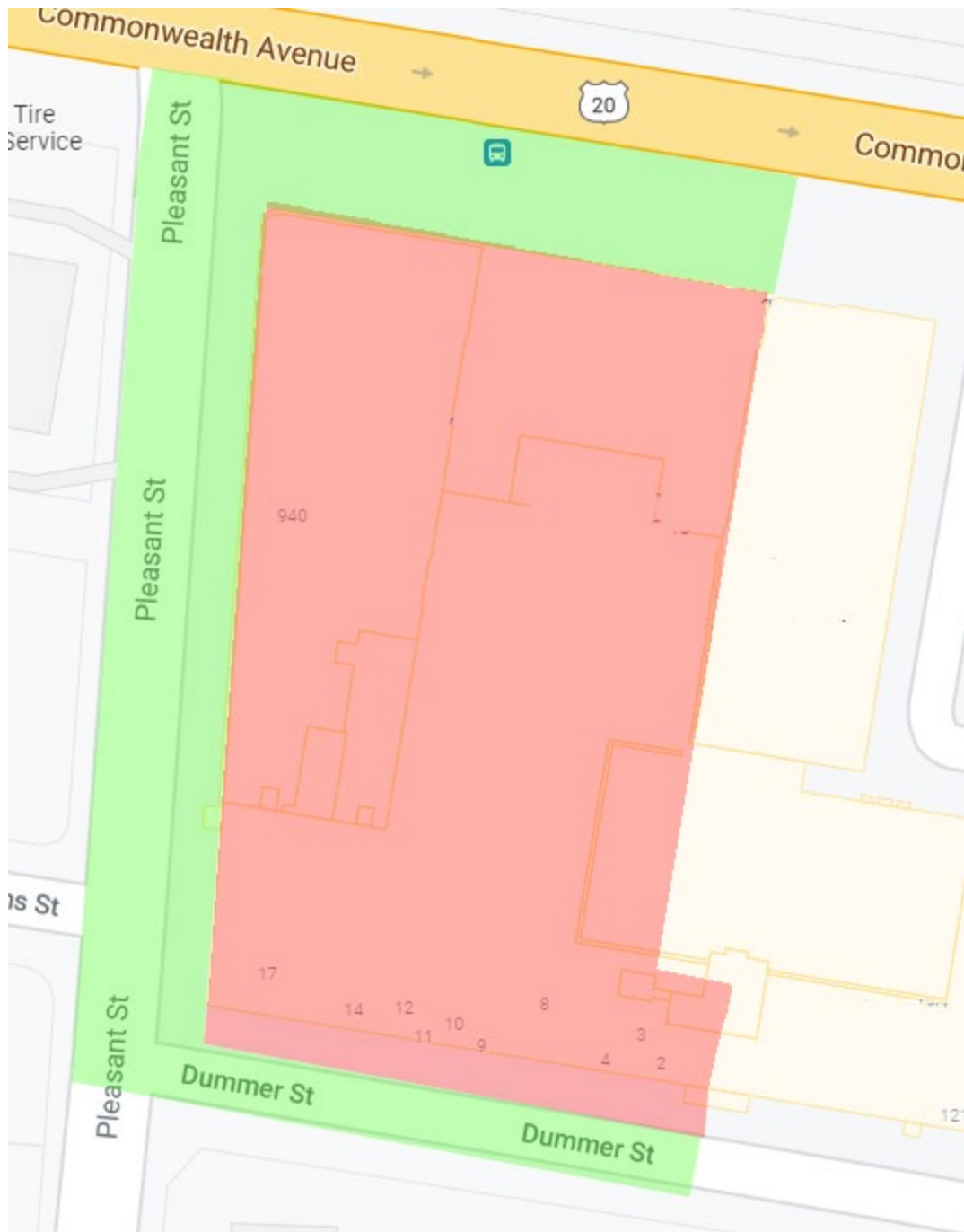
Green: Public Property

Note: The two NECO Center for Eye Care locations are leased spaces within larger buildings. Thus, the Clery Geography represented below is an approximation. For detailed floorplans of the leased space, please contact the Office of Facilities Operations and Administration at 617-266-2030 or email facilities@neco.edu.

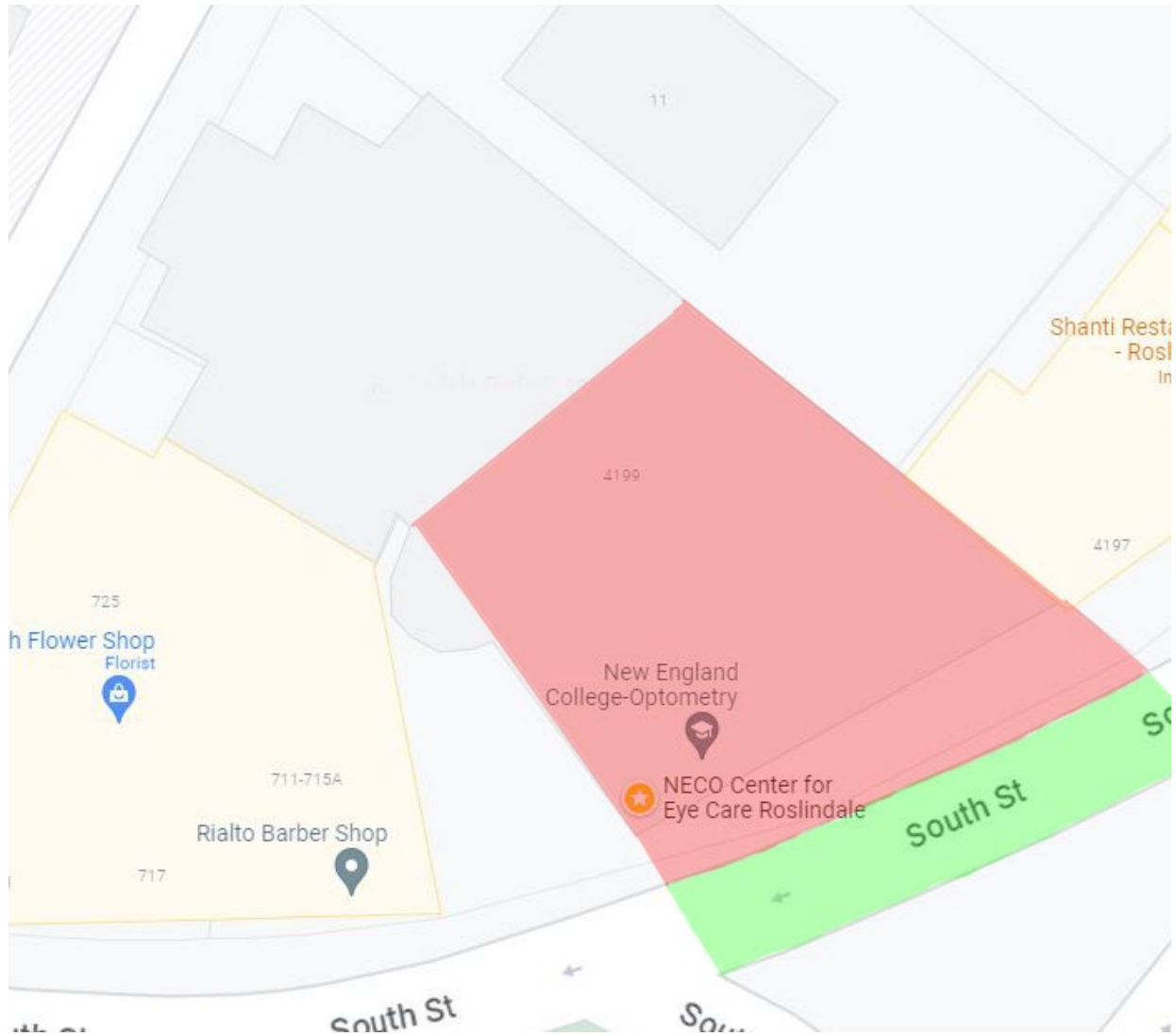
Main Campus: 424 Beacon Street, Boston, MA 02115



NECO Center for Eye Care Commonwealth: 930 Commonwealth Avenue,
Boston, MA 02215 (approximation; see note)



NECO Center for Eye Care Roslindale: 4199 Washington Street, Roslindale, MA 02131 (approximation; see note)



Campus Safety and Security

The College is committed to creating and maintaining a working, learning, and social environment that is free of violence, and has zero tolerance for threats or acts of violence against members of the campus community, either on campus or at sites hosting College events or programs. Such conduct is subject to disciplinary action up to and including dismissal from employment, expulsion from the College, and/or civil or criminal prosecution, as appropriate.

In the event of an emergency on campus, individuals should immediately dial 911. If 911 is dialed from a NECO landline, designated responders within the organization automatically receive a notification, which allows them to assess the situation and prepare for the arrival of emergency services.

The Office of Facilities Operations and Administration maintains an emergency contact list, which is available to the community on the Portal and posted in various laboratories.

Physical Security

The College makes campus safety a priority. Its professional staff and campus community actively participate in shared responsibilities to help protect personal safety. NECO maintains a closed campus, with all community members and visitors accounted for when they're on site. ID cards are issued to current students and employees, and must be worn at all times while on campus. Visitors to the Beacon Street campus are issued a temporary visitor badge and are escorted by an active community member all times while on campus.

Critical doors—including 424 Beacon Street's exterior doors, doors to research labs containing hazardous materials, and clinic doors—are accessible only by individuals with appropriate ID card access, and heavily-vetted leadership with master keys. The Office of Facilities Operations and Administration manages the card access system, as well as the inventory and distribution of master keys. Security cameras are installed at strategic points in all three campuses.

The Office of Facilities Operations and Administration makes every effort to issue timely warnings and inform the campus community about incidents or patterns of crime as follows:

- When circumstances warrant, crime alerts are distributed via email to the entire College community, posted on the NECO Portal in a timely manner, and/or broadcast over the Emergency PA System at Beacon Street.
- The Office of Facilities Operations and Administration maintains a daily log of all crimes reported in the last 60 days as having occurred on campus. The log is available on the Portal. An archive of older reports is available upon request.

Security Personnel

The College contracts with a professional security guard agency to provide a roving and stationary security guard during evenings and weekends at the 424 Beacon Street and 930 Commonwealth Avenue locations. An in-house Lead Security Guard trains and oversees all contracted guards. NECO security is responsible for observing and reporting, and does not have the authority to make arrests or investigate crimes. Security calls 911 to escalate incidents requiring intervention. The Boston Police Department, with whom NECO has an executed Memorandum of Understanding (MOU), is typically the agency with jurisdiction.

NECO also has executed MOUs with the Boston Area Rape Crisis Center (BARCC) and Casa Myrna, local nonprofit organizations, which formalize the commitment of the parties to work together to:

- Provide trauma informed services to individuals within the College's programs or activities who have been impacted by sexual assault or relationship violence.
- Engage in targeted prevention efforts.
- Improve the College's overall response to allegations of sexual assault and relationship violence.

Emergency Notifications

Emergency notifications are used to, "immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus" (34 CFR 668.48(g)). These situations include, but are not limited to:

- Human behavior; campus or community violence
- Natural disasters; severe snow, severe storm, flood, earthquake
- Utility outages and leaks; gas, electric, water
- Hazardous events; toxic substance spills or releases
- Unexpected building closures
- Any other event posing an immediate threat to the campus

The College has an Emergency Notification System (ENS) that sends mobile, voice, and text notifications to students, faculty, staff, and the Board of Trustees during catastrophic events. This system complements other communication protocols used during emergencies, such as email, the emergency public address system, and fire alarms. The ENS will be initiated as quickly as possible to ensure the safety of the NECO community, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Upon notification of an emergency, the Office of Facilities Operations and Administration is responsible for evaluating the situation, informing College leadership, and initiating the ENS. The ENS message contains the location(s) affected, actions needing to be taken by

the community, and, if necessary, a promise of follow-up.

Faculty, staff, and students are automatically enrolled in the ENS upon commencement of studies or employment, but may opt out at any time by notifying the Office of Facilities Operations and Administration in writing. The Office of Facilities Operations and Administration tests the ENS system twice a year.

Emergency Evacuations

The College's Emergency Action Plan is available in its entirety on the Portal. Evacuations are initiated through activation of the fire alarm, an announcement over the emergency public address system, and/or an ENS notification.

The College circulates the Emergency Action Plan by email, and performs emergency evacuation drills, at least once annually. Students are trained on egress routes during first year orientation. Employees are trained within the first month of employment.

Evacuation Routes: Beacon Street Special Considerations

During a fire evacuation from Beacon Street, community members are encouraged to avoid the stairways in the Rotunda and Atrium, as these areas are likely to fill with smoke quickly. The emergency exits are designated to provide clear spaces for people to escape from the building.

Evacuees should follow evacuation routes depicted on the fire exit signs located on the wall next to each stairwell door. Once a classroom or lab is evacuated, the primary faculty member should turn off all electrical and gas devices, and make sure the classroom corridor door is unlocked and closed. The lights should be left on.

No one may re-enter any building until receiving the "all clear" from the Fire Department.

Evacuating People with Disabilities

Human Resources and Academic Affairs keep the Office of Facilities Operations and Administration aware of community members with permanent or temporary disabilities that would impact their ability to evacuate safely without assistance. Operations develops a Personal Evacuation Plan for each person they're made aware of. This might include individualized evacuation training, plans for the Operations team to assist directly, and more. Individual circumstances and the situation should dictate the best means for evacuating the person(s) needing assistance.

- Where possible, Operations will use communication devices to alert emergency responders to their location and allow them to provide assistance down the stairwells.
- If the situation dictates immediate evacuation, Operations will use the evacuation chairs

located between floors in the emergency exit stairwells to lower the person down the stairs and out of the building.

Safety Training and Programming

Information on College policies and procedures, as well as general safety and security tips and strategies for preventing crime, are disseminated throughout the year. Targeted campaigns include:

- Safety orientations for new hires and at student orientation. This includes training on the Emergency Action Plan;
- Mandatory Active Threat Response Training for new students and biannually for employees, offered through the Ed Davis Company;
- Reminders in campus publications distributed by Human Resources and the Library;
- Follow-up emails after incidents or near misses emphasizing safety best practices;
- Posts on College social media during awareness months to spread information and resources.
- Annual online OSHA training for students and employees.

NECO encourages all community members to be responsible for their own safety and security, as well as the safety and security of others.

Reporting Crimes and Other Emergencies

NECO encourages all members of the community to report crimes and other safety incidents promptly and accurately to Operations and/or the applicable law enforcement agencies. Individuals may contact Operations by calling 617-266-2030 or emailing facilities@neco.edu. In an emergency, immediately dial 911.

Witnesses or victims of crimes, emergencies, or injuries are encouraged to complete an incident report, which the Office of Facilities Operations and Administration keeps on file for use in preparing this report and for identifying potential trends of unsafe occurrences. All incident reports are submitted on a voluntary basis, stored in a secure location, and are only shared with individuals who need to respond to the incident. The incident report form is available on the Portal.

Operations reviews each incident report for completeness, to determine if further action is needed, and to inform other departments if necessary. The Safety Committee reviews aggregate incident data once a quarter.

Campus Security Authorities

While the College prefers that community members report crimes directly to the Office of

Facilities Operations and Administration or local law enforcement, the College also recognizes that some individuals might be more comfortable contacting other individuals or offices.

Under the Clery Act, Campus Security Authorities (“CSAs”) include members of an institution’s security department, as well as any, “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” (34 CFR 668.46(a)). The 2021 Clery Act Appendix for FSA Handbook defines an official as any individual who, “has the authority to institute corrective measures for Title IX purposes” (2021 FSA Appendix, 3).

CSAs are required to provide resources to victims and report crimes listed under the Clery Act to the Primary CSA (Mollie Forman, Manager of Compliance and Safety), though they are not required to report the identity of the victim. In cases where the community may be at risk, NECO strongly encourages full reporting even if the information is otherwise privileged. In any event, the College respects the victim’s choice.

CSAs receive training for their role at least once annually. This training includes a summary of their responsibilities, resources for crime victims, and an overview of many of the policies included in this Report. CSAs should inform the Primary CSA of any reports within 24 hours of receipt.

At the time of publication, the following act as New England College of Optometry’s CSAs:

Title	Name	Phone	Email
Assistant Professor, Clinical Education & Clinical Sciences Chair, Student Affairs Committee	Benjamin Young, OD	617-587-5547	youngb@neco.edu
Lead Security Guard	Brianna Hudson	617-587-5616	hudsonb@neco.edu
Executive Director, Human Resources Title IX Coordinator	Carolynn Miller	617-587-5787	millerc@neco.edu
Vice President/Dean, Academic Affairs	Erik Weissberg, OD	617-587-5750	weissberge@neco.edu
Vice President, Professional Affairs Title IX Deputy Coordinator	Gary Chu, OD	617-834-3245	chu@neco.edu
Director, Center for Academic and Professional Achievement	Jill Cummings	617-587-5697	cummingsj@neco.edu

Title	Name	Phone	Email
Associate Dean, Student Affairs	Kristen Tobin	617-587-5624	tobink@neco.edu
Associate Director, Student Advising and Accessibility	Marianna Toumpourou	617-202-8648	toumpouroum@neco.edu
Manager, Compliance and Safety (Primary CSA) Title IX Deputy Coordinator	Mollie Forman	857-301-2777	formanm@neco.edu
Assistant Director, Student Services and Events	Olga Smirnova	617-587-5615	smirnovao@neco.edu
Director, Campus Planning and Facilities	Shawne Gillies	617-413-2512	gillies@neco.edu
Director, Diversity, Equity, Inclusion & Belonging	Simone Jadcak	215-870-5554	jadcaks@neco.edu
Manager, Building, Grounds, and Security	Tecleab Neguse	617-587-5578	neguset@neco.edu
Director, Owned Clinics and Outreach Services	Timothy Bossie, OD	617-396-8599	bossiet@neco.edu

While CSAs are the primary officials responsible for the health and safety of the community, it is the responsibility of every administrator, faculty member, staff member, and student to take any threat of violence or danger seriously. Each threat must be reported to the appropriate authority. Failure to do so may result in disciplinary action.

NECO's contractual relationship with Christie Campus Health, which provides 24/7 in-the-moment and crisis support and counseling services, includes instructions for the 24/7 licensed counselors to provide students with information on how to voluntarily report crimes to NECO. NECO does not directly employ pastoral or professional counselors.

Title IX, VAWA Protections, and Sexual Misconduct

New England College of Optometry is committed to providing a safe learning and working environment for all members of the college community that is free from all forms of discrimination, harassment, sexual or gender-based misconduct, and related violence. NECO does not discriminate on the basis of sex, gender, or sexual orientation in its education programs or activities and prohibits specific forms of behavior that violate Title IX of the Educational Amendments of 1972 ("Title IX") or other applicable state and federal laws.

Policies regarding Title IX and the Massachusetts Campus Sexual Violence Act are available

on the public NECO website: <https://www.neco.edu/consumer-information>

Definitions of Prohibited Conduct Under the Title IX Policy

Sexual Harassment is defined as unwelcome requests for sexual favors; behavior of a sexual nature where submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment or participation in a NECO-sponsored educational program or activity; conduct that has the purpose or effect of unreasonably interfering with an individual's academic or work performance, as well as creating an intimidating or offensive educational or work environment.

Sexual Assault is defined by The Commonwealth of Massachusetts as "any sexual activity that is forced, coerced, or unwanted" and refers to the crimes of rape and indecent assault and battery.

Relationship Violence encompasses dating violence and domestic violence and can involve current or former intimate partners, spouses, social or dating relationships.

Stalking is conduct directed at a specific person that is unwelcome and would cause a reasonable person to fear for their safety, fear for the safety of others, or suffer emotional distress. Stalking behaviors may include unwanted following or watching, unwelcome gifts, or communications in person, in writing, or via email and social media.

Harassment Based on Sexual Orientation, Gender, or Gender Identity is defined as derogatory comments, actions, or conduct that may include acts of verbal, nonverbal, cyber, or physical aggression, intimidation, or hostility, even if those acts do not involve conduct of a sexual nature. Such conduct is directed toward an individual by virtue of their actual or presumed sexual orientation, gender, or gender identity and humiliates or intimidates them, impede academic or work performance.

Definition of Consent

Consent is a clear and voluntary agreement to engage in specific acts of sexual contact or activity, communicated through mutually understandable words or actions. Consent is freely informed and actively given and can never be assumed or implied.

Incapacitation: Consent is not present when an individual is incapacitated. An Incapacitated individual is someone who cannot make rational, reasonable decisions because they lack the capacity to understand the "who, what, when, where, why, or how" of sexual interaction. This includes a person whose incapacity results from mental disability, sleep, involuntary physical restraint, unconsciousness, or use of alcohol or other drugs. Incapacitation is a state beyond drunkenness or intoxication.

Under legal age, consent is never present if an individual is under the legal age of consent

(16 in the state of Massachusetts).

Procedures for Survivors of Sexual or Gender-Based Misconduct

In the immediate aftermath of an incident, the survivor should ensure their immediate safety, calling 911 if necessary. Survivors requiring medical attention can receive treatment at any medical facility, but are encouraged to utilize a SANE-designated provider. SANE-designated hospitals in the Boston area include:

<p>Beth Israel Medical Center 330 Brookline Ave Boston, MA 02215 617-667-7000</p>	<p>Boston Medical Center 1 Boston Medical Center Place Boston, MA 02118 617-638-8000</p>	<p>Brigham and Women’s Hospital 75 Francis St Boston, MA 02115</p>
<p>Cambridge Hospital 1493 Cambridge St Cambridge, MA 02139 617-665-1000</p>	<p>Massachusetts General Hospital 55 Fruit St Boston, MA 02114 617-726-2000</p>	<p>Newton-Wellesley Hospital 2014 Washington St Newton, MA 02462 617-243-6000</p>

Preserving Evidence

Survivors of sexual or gender-based misconduct are encouraged to take steps to preserve evidence, which may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order.

To preserve evidence, it is recommended to avoid bathing, douching, smoking, using the toilet, or cleaning the location where the incident occurred. Survivors should save clothing, jewelry, sheets, or towels in a paper bag.

Reporting the Offense

All NECO employees are required to report instances of sexual or gender-based misconduct. Reports, by survivors or third parties, should be submitted to the Title IX Coordinator or Deputy Coordinator:

<p>Carolynn Miller Executive Director Human Resources Title IX Coordinator millerc@neco.edu Office: 617-587-5787 <i>Office routes to cell</i></p>	<p>Dr. Gary Chu Vice President Professional Affairs Title IX Deputy Coordinator chu@neco.edu Office: 617-587-5541 Mobile: 617-834-3245</p>	<p>Mollie Forman Manager Compliance & Safety Title IX Deputy Coordinator formanm@neco.edu Office: 617-587-5618 Mobile: 857-301-2777</p>
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Individuals may also report concerns to:

- Incident Report Form, available on the Portal
- 617-587-5753
- voice@neco.edu

The Title IX Coordinator has the primary responsibility for coordinating NECO's efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under the Title IX policy.

Additionally, the Title IX Coordinator is responsible for:

- Tracking and monitoring incidents, including sex-based discrimination, harassment, retaliation, and other sexual or gender-based misconduct outlined in this policy.
- Ensuring that NECO responds effectively to each report.

After an alleged violation of the Title IX policy is reported, the Title IX Coordinator will ensure that the appropriate steps are taken, all of which are communicated in writing at the start of the process. These steps include:

- Providing written notification of the complainant's rights and options.
- Providing written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for survivors.
- Providing written notification of options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures.
- Providing reasonable and appropriate supportive measures to the survivor, with or without the filing of a formal complaint and regardless of whether the survivor chooses to report the crime to local law enforcement.
- Obtaining an external investigator (when appropriate).
- Assigning advisors (when appropriate)
- Determining which resolution process (formal investigation or informal internal resolution) will apply based on the allegations raised.

If the Title IX Coordinator determines that an alleged incident does not fall under Title IX, the Title IX Coordinator may refer the matter for evaluation under:

- NECO's Non-Discrimination Policy
- Student Code of Conduct
- Employee Manual
- Faculty Handbook
- NECO Policy on Consensual Relationships which prohibits romantic and/or sexual relationships between employees and students (undergraduate, graduate or doctoral), and employees and any individual whom that person supervises or evaluates in any manner.

All parties have options, all of which are voluntary, including seeking counseling or assistance, making a formal report under the Title IX policy, and/or making a report to law enforcement (with or without assistance from campus authorities). Depending on the nature of the incident, NECO may be able to assist in issuing a no-contact order between the complainant and respondent. A legal harassment protection order may be available through a local court. NECO recognizes that deciding among these options is a personal decision, and encourages individuals to seek assistance to explore all potential reporting and support options.

Protecting Confidentiality

NECO is committed to protecting the privacy and dignity of all individuals, and the integrity of the investigatory process, and will make every effort to keep information related to sexual misconduct confidential.

NECO Employees

Information reported to NECO employees, including Title IX Officers, will, to the greatest extent possible, only be shared on a need-to-know basis, such as in the course of an investigation, to protect the community from imminent danger, and to fulfill public recordkeeping requirements such as publishing information in the Daily Crime Log and the Annual Security Report. Discretion will be maintained in all cases, and all individuals spoken to will be reminded of their obligation to keep information private. NECO complies with all applicable state and federal laws governing confidentiality, including the Family Educational Privacy Act (FERPA).

Before publishing a sexual misconduct-related crime in the Daily Crime Log, the Compliance and Safety Manager will consult with the Title IX Office (and law enforcement, if applicable) to determine if the entry would jeopardize an ongoing investigation or the safety of an individual, cause a suspect to flee or evade detection, or result in the destruction of evidence. If yes to any of these, the entry will be withheld until the adverse effect is no

longer likely to occur.

Accommodations and protective measures provided to involved parties will be kept confidential to the extent that maintaining such confidentiality will not impair the ability of the institution to provide the accommodations or protective measures. The minimum necessary information to secure supportive measures will be used in all cases.

Confidential Community Resources

Confidential community resources, such as licensed counselors, may only share information with the individual’s explicit written permission or under specific circumstances like the continuing threat of serious harm or suspected abuse or neglect of a minor. These resources are not obligated to report information to NECO.

NECO encourages people to take advantage of confidential resources such as the Employee Assistance Program (operated by Prudential Insurance) for employees, and Thrive @ NECO (operated by Christie Campus Health) for students. Additional confidential resources in the community include, but are not limited to:

<p>Boston Area Rape Crisis Center (BARCC) barcc.org 800-841-8371 (24/7 hotline; live webchat 9am-11pm)</p>	<p>Casa Myrna Casamyrna.org 877-785-2020 (24/7 multilingual hotline) <i>Domestic violence focused</i></p>	<p>Asian Task Force Against Domestic Violence atask.org 617-338-2355 (24/7 multilingual hotline)</p>
<p>Victim Rights Law Center victimrights.org 617-399-6720</p>	<p>Fenway Community Health Violence Recovery Program fenwayhealth.org 617-927-6250 <i>LGBTQ+ focused</i></p>	<p>1 in 6 1in6.org 877-628-1466 (24/7 chat hotline) <i>Male survivor focused</i></p>

Disciplinary Procedures

NECO follows all investigatory and adjudicatory processes required under Title IX and the 2020 Final Rule (full details may be found in NECO’s Title IX policy). Following these processes and the live hearing, the hearing officer will issue a written determination, which must include the following:

- The allegations that potentially constitute prohibited conduct under this Policy;
- A description of all of the procedural steps of the Adjudication Process under this Policy (from receipt of a Formal Complaint to the determination regarding the responsibility of the Respondent, including any notifications of the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and

- hearings held);
- The findings of fact supporting the hearing officer's determination;
 - The conclusion(s) and a rationale as to whether the Respondent is responsible for each allegation;
 - The disciplinary sanctions, if applicable;
 - The remedies, if applicable, designed to restore the Complainant's access to the education program or activity; and
 - The institution's procedures and permissible bases for the parties to appeal, if applicable.

The hearing officer will send a copy of the written determination to the Title IX Coordinator, who will then share it with Complainant and Respondent simultaneously.

The following sanctions may be considered and imposed by the hearing officer:

List of possible sanctions for Student Respondents:

- Written Warning
- Training/Counseling
- Probation
- Suspension
- Expulsion
- Withholding or revocation of Degree

List of possible sanctions for Employee Respondents:

- Written Warning
- Training/Counseling
- Employment probation;
- Job demotion or reassignment of duties
- Suspension with or without pay for a specific period of time;
- Dismissal or termination;
- Ineligible for rehire

Sanctions will be determined based on the seriousness of the misconduct and on the individual's prior disciplinary history if any. Sanctions will be communicated to the parties, as appropriate, in writing by the Title IX Coordinator.

Both parties may appeal the hearing officer's determination. The appeal should be submitted via email to the Title IX Coordinator.

Training and Education

NECO provides annual training to personnel with responsibilities under the College's Title IX policies, including training to ensure personnel understand the policy and are able to appropriately address allegations, provide accurate information to members of the

community, protect survivors' safety, and promote accountability. The Title IX Coordinator ensures that ongoing training and education regarding sex/gender-based harassment, discrimination, and retaliation take place, as well as compliance-related reporting.

Title IX Officers receive training through Institutional Compliance Solutions:

<http://icslawyer.com/community-access/community-access-higher-ed/>

Incoming students receive training on Title IX and sexual misconduct prevention within the first 45 days of matriculation. Annual prevention and awareness training is provided for all students every fall semester.

In addition to formal training, NECO utilizes social media and campus publications to spread resources, especially during awareness months. NECO also publishes a "Support for Survivors" packet that contains information on options and resources.

Sex Offender Registry

In Massachusetts, individuals can obtain information on registered sex offenders living and working in the immediate area by contacting their local police department. General information about the Commonwealth of Massachusetts Sex Offender Registry Board can be found at www.mass.gov/orgs/sex-offender-registry-board, or by calling (978) 740-6400.

Drug and Alcohol Abuse Prevention

NECO supports, promotes, respects, and expects adherence to federal and state laws regarding alcohol and drugs. The entire NECO community must assume responsibility for providing a climate that respects personal rights, federal and state laws, promotes safety, and models appropriate and normally acceptable behavior.

The College strictly prohibits, on its premises and at all College-sponsored functions off-campus:

- The possession, use or distribution of illicit drugs, including the inappropriate possession, use, or distribution of pharmaceutical drugs;
- The possession or consumption of alcohol by, or distribution to, persons under 21 years old.

Additionally, NECO prohibits the unlawful use, possession, sale, distribution, or manufacture of controlled substances as part of college activities. NECO also prohibits the use, possession, sale, distribution, or manufacture of other substances, even though they may not be illegal, including, but not limited to, whipp-its, 2-C's, molly, ecstasy, NBOME, Spice, K-2, and non-prescribed performance enhancing drugs ("prohibited substances").

Students receive annual training on the dangers of illicit drug and alcohol use through the training program Vector Solutions. The full Drug and Alcohol Prevention Policy, which includes information on the dangers of illicit drug and alcohol use and how to seek help, is distributed annually to all NECO community members and can be found on the NECO website: <https://www.neco.edu/consumer-information/>

Policy on Recreational Marijuana

Although the Commonwealth of Massachusetts has legalized recreational use of marijuana by people at or over the age of 21, NECO must abide by federal laws, including the Drug-Free Schools and Communities Act, in order to remain eligible for federal funding, including funding for student financial aid. Therefore, NECO continues to maintain and enforce its prohibition on the use of marijuana. This means that for all students, regardless of age, NECO prohibits the use, sale, manufacture, distribution, possession, or facilitation of the use of marijuana on campus.

Disciplinary Action

Students and employees violating local, state, or federal laws regarding drugs and alcohol on College premises or at College functions are not exempt from the corresponding legal sanctions. Disciplinary action taken by the College for legal violations may include a referral to local authorities for prosecution, internal sanctions including suspension or termination/expulsion, and/or mandatory completion of an appropriate rehabilitation program as a condition of continued status.

Employees who are convicted of drunk driving or driving to endanger due to drug or alcohol use, who have responsibilities which include driving College vehicles or transporting College students/employees, jeopardize their employment if such conviction or circumstances surrounding the conviction pose a risk to the College community. The College will enforce strict sanctions as warranted by the circumstances.

Crime Statistics

Each October the College files a campus crime data report for the preceding calendar year with the U.S. Department of Education. This report is required of all postsecondary institutions that receive Title IV funding as required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, and the Violence Against Women Act.

The College's reports may be found at <http://ope.ed.gov/security/Index.aspx>. There are separate reports for each of the following locations:

- Main Campus: 424 Beacon Street, Boston, MA 02115
- NECO Center for Eye Care Commonwealth: 930 Commonwealth Avenue, Boston, MA 02215
- NECO Center for Eye Care Roslindale: 4199 Washington Street, Roslindale, MA 02131

The statistics represent alleged criminal offenses, both on campus and on public property, reported to the Office of Facilities Operations and Administration and/or the Boston or Brookline Police Department. Therefore, the data collected does not necessarily reflect prosecutions or convictions for crime. The site contains a glossary that provides definitions for the various crime and the geographic categories presented in the reports.

For the calendar years 2020, 2021, and 2022 the statistics for crimes as reported to the Office of Facilities Operations and Administration are as follows:

Main Campus Crime Statistics: Criminal Offenses

Criminal Offense	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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	1	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0

Main Campus Crime Statistics: Hate Crimes

	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Hate Crimes						
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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
Simple Assault	0	0	0	0	0	0
Larceny/Theft	0	0	0	0	0	0
Threats/Intimidation	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0

Main Campus Crime Statistics: VAWA Offenses

	2020		2021		2022	
VAWA Offenses	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0

Main Campus Crime Statistics: Arrests and Disciplinary Actions

	2020		2021		2022	
Arrests and Disciplinary Actions	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Weapons: Carrying, Possessing, etc.	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0

Main Campus Crime Statistics: Unfounded Crimes

	2020	2021	2022
Unfounded Crimes	0	0	0

Commonwealth Campus Crime Statistics: Criminal Offenses

Criminal Offense	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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

Commonwealth Campus Crime Statistics: Hate Crimes

	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Hate Crimes						
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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
Simple Assault	0	0	0	0	0	0
Larceny/Theft	0	0	0	0	0	0
Threats/Intimidation	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0

Commonwealth Campus Crime Statistics: VAWA Offenses

	2020		2021		2022	
VAWA Offenses	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0

Commonwealth Campus Crime Statistics: Arrests and Disciplinary Actions

	2020		2021		2022	
Arrests and Disciplinary Actions	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Weapons: Carrying, Possessing, etc.	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0

Commonwealth Campus Crime Statistics: Unfounded Crimes

	2020	2021	2022
Unfounded Crimes	0	0	0

Roslindale Campus Crime Statistics: Criminal Offenses

Criminal Offense	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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

Roslindale Campus Crime Statistics: Hate Crimes

	2020		2021		2022	
	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Hate Crimes						
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	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
Simple Assault	0	0	0	0	0	0
Larceny/Theft	0	0	0	0	0	0
Threats/Intimidation	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0

Roslindale Campus Crime Statistics: VAWA Offenses

	2020		2021		2022	
VAWA Offenses	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0

Roslindale Campus Crime Statistics: Arrests and Disciplinary Actions

	2020		2021		2022	
Arrests and Disciplinary Actions	On Campus	Public Property	On Campus	Public Property	On Campus	Public Property
Weapons: Carrying, Possessing, etc.	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0

Roslindale Campus Crime Statistics: Unfounded Crimes

	2020	2021	2022
Unfounded Crimes	0	0	0