

Campus Security and Safety Report

Crime Awareness and Campus Security

Avera McKennan School of Radiologic Technology is committed to maintaining a safe and healthy environment for all employees and students by protecting staff, hospital property, and equipment. The US Department of Education passed the *Crime Awareness and Campus Security Act of 1990* to create a mandatory and consistent reporting process to provide information and documentation for post-secondary institutes to share important safety information with students, parents and employees.

Compliance with the Jeanne Clery disclosure of *Campus Security Policy and Campus Crime Statistics Act, or Clery Act (amended by the Violence Against Women Reauthorization Act of 2013)*, provides students and families with detailed information about this Act which is available from the Department of Education Campus Security web site.

Data for the Annual Security and Safety Report for the Avera McKennan School of Radiologic Technology is compiled annually by Tim Auch, Avera McKennan Security Manager. This report documents three calendar years of campus crime statistics. The report is published by October 1 each year and is available to the public online at <http://www.avera.org/mckennan/medical-education/radiologic-tech-school/>. Campus crime statistics are also available at <http://ope.ed.gov/security>.

Prospective students, current students and employees can access the report from the school website. Students and school faculty are made aware of the following Avera McKennan Policies during orientation: Harrassment Free Work Environment; Campus Security Plan; Safe Environment Policy; and Emergency Response Codes.

Individuals who are unable to obtain a paper copy from the web site may request one from:

Avera McKennan School of Radiologic Technology

1325 S. Cliff Avenue

Sioux Falls, SD 57117-5045

Susan.calmus@avera.org

Hospital Access and Security

- Security services include: 24 hour patrol of the Avera McKennan Hospital and grounds, television surveillance, and escort service to the parking lots or ramps, upon request.
- In cases where alternative housing is required, EAP will be contacted to assist with accommodations.
- Photo ID/Security badges are issued at the beginning of the Radiologic Technology Program. ID badges must be worn in the clinical setting. The badge will permit access to clinical assignments in secured areas.

To Report a Crime

All employees and students are responsible for reporting violence (dating, domestic), sexual assault, stalking, or bullying to their respective supervisor or school faculty. Supervisors are responsible to follow up concerning all reports of violence, sexual assault, stalking, bullying. If there is an immediate threat of bodily harm from any person, call a security code and law enforcement for immediate assistance.

Reports of patient or visitor-involved violence or bullying will be handled by Avera McKennan Security, local law enforcement and/or the Risk Management Department.

- **Hospital Emergency Code: 55**

- **Security:** 605-322-7497; or call the safety hotline M-F (605-322-7389)
- **Sioux Falls Police Department:** 911

Confidential Crime Reporting

To the extent possible, Avera McKennan will maintain the confidentiality of the reporting employee/student and the investigation; when appropriate Avera McKennan may make certain disclosures concerning the incident and investigation.

Annual Disclosure of Crime Statistics

In compliance with the *Clery Act*, the Security Manager is responsible for maintaining the data required of all Title IV and for annual reporting of Crime Statistics on the Campus Security and Safety site at <http://ope.ed.gov/security>.

Crime Logs

A crime report and logs are available upon request through the Sioux Falls Police Department, Community Services Division. Call 605-367-7226 and ask for the crime log for Avera McKennan, 1325 S. Cliff Avenue, Sioux Falls, SD 57117-5045. The crime log includes:

- Nature of crime
- Date of crime
- Location of crime
- Reference number to a full report

Procedures for Investigating Incidents of Workplace Violence

In the event of a reported crime, hospital security staff can make a house arrest and will detain an individual until local law enforcement arrives (unless the victim chooses to decline notification), and will follow the procedure listed below:

- Visiting the scene of an incident as soon as practicable
- Interviewing injured and threatened persons and witnesses
- Examining the workplace for security risk factors associated with the incident, including any reports of inappropriate behavior by the perpetrator
- Determining the cause of the incident
- Taking mitigating action to prevent the incident from recurring

In cases involving an employee, human resources will be notified and the disciplinary action policy will be followed.

Sex Offender Registration

In accordance with the "Campus Sex Crimes Prevention Act" of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the *Clery Act* and the Family Educational Rights and Privacy Act of 1974, a link is provided to the Minnehaha County Sex Offender Registry site. The registered sex offender list may be obtained from the Sioux Falls Police Department, Records Division, 320 W 4th St, Sioux Falls, SD or call 605-367-7226 or go to www.minnehahacounty.org and click on "sheriff".

Crime Prevention and Security Awareness Programs

During student orientation, the students attend a Safety In-service which is presented by the Avera McKennan Security Manager. Various topics are covered to educate the students on security and crime prevention.

Annually, students and employees complete the following online educational courses regarding prevention of crimes:

- Understanding Workplace Discrimination and Harassment
- Workplace Violence Prevention

In addition, the Avera McKennan School of Radiologic Technology Policy & Procedure Manual contains information and guidelines related to a drug and alcohol free workplace.

Referral Resources - Employee Assistance Program

Referral resources are available to employees and students through the Employee Assistance Program by calling **605-322-4069** or **1-800-527-9394**, with day and evening appointments available. The first three visits are provided free of charge.

Reportable Crimes

The following is a list of reportable crimes as mandated by the *Clery Act*: (Definitions are taken from the Handbook for Campus Crime Reporting published by the U.S. Department of Education).

Murder and Non-Negligent Manslaughter: The willful (non-negligent) killing of one human being by another. This includes deaths occurring as the result of a fight, but does not include suicides or accidental deaths.

Negligent Manslaughter: the killing of another person through gross negligence, which is the intentional failure to perform a manifest duty in reckless disregard of the consequences as affecting the life or property of another.

Sex Offenses- Forcible and Non-Forcible: these offenses and others are considered acts of sexual assault, as that term is defined in 42 U.S.C. 13925 (29):

Forcible:

Forcible Rape: Carnal knowledge of a person forcibly and against his or her will, including when the victim is incapable of consenting because of physical or mental incapacity or youth.

Forcible Sodomy: Oral or anal sexual intercourse with another person forcibly and against his or her will, including when the victim is incapable of consenting because of physical or mental incapacity or youth.

Sexual Assault With an Object: The use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity. An object or instrument is anything used by the offender other than the offender's genitalia. Examples are a finger, bottle, handgun, stick, etc.

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

Sexual Assault: The term "sexual assault" means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent. South Dakota's sex offenses are defined in SDCL 22-22 et seq. You can find those definitions by following this link:

http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=22-22 Sexual Assault:

Non-Forcible Sex Offenses:

These include unlawful non-consensual sexual intercourse. There are two types defined in the Clery Act:

Incest: Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. SD defines incest as follows: "Any persons, eighteen years of age or older, who knowingly engage in a mutually consensual act of sexual penetration with each other: (1) Who are not legally married; and (2) Who are within degrees of consanguinity within which marriages are, by the laws of this state, declared void pursuant to § 25-1-6.

Persons engaging in sexual intercourse with others within the following "degrees of consanguinity" are included in the definition of incest: "Between parents and children, ancestors and descendants of every degree, and between brothers and sisters of the half as well as the whole blood, and between uncles and nieces, or aunts and nephews, and between cousins of the half as well as of the whole blood, are null and void from the beginning, whether the relationship is legitimate or illegitimate. The relationships provided for in this section include such relationships that arise through adoption." SDCL 25-1-6

Statutory Rape: Non-forcible sexual intercourse with a person who is under the statutory age of consent. In SD, which is the jurisdiction that matters here, the age of consent is 16.

Consent: The issue of consent is relevant in sex-offense prosecution. SD law defines consent by stating when consent is absent, such as in forceful situations, situations in which the victim is incapable of consent, or when the victim is under a certain age, which in SD is 16. SD law does not use a general definition of consent. The following definition from Black's Law Dictionary is, however, helpful: "A concurrence of wills. Consent in an act of reason, accompanied with deliberation, the mind weighing as in a balance the good or evil on each side." Thus, anytime a person's mind is incapable of dispassionate reasoning, consent is absent.

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

Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

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

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

Burglary: The unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft: Theft or attempted theft of a motor vehicle.

Larceny/Theft: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another (other than motor vehicle theft).

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

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

Domestic Violence: The term “domestic violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction. SD laws regarding protection from domestic violence can be found here: http://legis.sd.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=25-10

Dating Violence: The term “dating violence” means violence committed by a person –

- (A) who is or has been in a social relationship of a romantic or intimate nature with the victim;
and
- (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship
 - (ii) The type of relationship
 - (iii) The frequency of interaction between the persons involved in the relationship

A “Dating Partner” is defined as a person who is or has been in a social relationship of a romantic or intimate nature with the abuser, and where the existence of such a relationship shall be determined based on a consideration of –

- (A) the length of the relationship
- (B) the type of relationship and
- (C) the frequency of interaction between the persons involved in the relationship

Stalking: engaging in a course of conduct directed at a specific person that would cause a reasonable person to –

- (A) fear for his or her safety or the safety of others, or
- (B) suffer substantial emotional distress.

Hate Crimes: a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender’s bias. **Bias** is a preformed negative opinion or attitude toward a group of persons based on their race, gender, actual or perceived gender identity, religion, disability, sexual orientation, or ethnicity/national origin.

Burden of Proof: In any Hospital campus action seeking to impose discipline for a violation of the Clery Act or other relevant Hospital rules, the Hospital uses the preponderance of the evidence burden of proof. Generally, this requires that more than 50% of the evidence point to the establishment of a fact or culpability. Since Hospital disciplinary procedures are civil in nature, the party asserting a claim has the burden of proving its truthfulness by a preponderance of the evidence.

Emergency Response and Evacuation Procedures

Overview: Because of the nature of Avera McKennan Hospital & University Health Center operations, it is essential that the organization is prepared to operate at all times, even under unusual or adverse circumstances. As per the Avera McKennan Hazard Vulnerability Analysis (HVA), high probability circumstances could include natural causes such as severe weather, fire, exposure to hazardous materials, interruption of basic utilities, mass casualties or acts of violence. Avera McKennan Hospital & University Health Center’s Emergency Operations Plan is designed to provide an organized response to the possible events.

Avera McKennan Hospital & University Health Center is recognized by the State of South Dakota as a NIMS compliant hospital facility. SMC utilizes the Incident Command System to coordinate its Hospital Command Center (JCC). Staff has been trained utilizing the FEMA-EMI ICS 100HC and ICS 200HC, as well as IS 700 programs.

Procedure to Disseminate Emergency Information

To ensure there is little to no delay in coordinating a response, the administrative staff has a 24/7 on call incident commander. The Hospital Administrator on call serves in the Incident Commander role. This enables the Hospital Administrator on call to immediately begin to coordinate command center responsibilities and initiate the appropriate response. All administrative staff is trained in the incident command process and all participate in the multi-year training and exercise plan.

The primary Command Center is located on the administrative floor of Avera McKennan Hospital, and an alternate command center has been identified if needed. The various forms of communication listed

below are used to disseminate information internally, externally, and the larger community. Each command center is capable of redundant communications in the following formats:

- Telephone
- Fax
- Email
- Cellular
- Instant Messaging
- VHF Two way radio
- State Digital Radio
- Television
- Weather Radio

Description of the Procedures Used for a Significant Emergency or Dangerous Situation

The emergency management program plan will be implemented in response to internal, external, regional, and national disasters at the discretion of Avera McKennan Administration.

- The command structure utilized by this facility, in coordination with the community wide command structure, is the Incident Command System as described in the Hospital Incident Command System Guidebook.
- The hospital's Emergency Operations Plan identifies the incident command system, who is in charge of specific activities, and when they are to assume oversight responsibilities.
- Avera McKennan shall be integrated into the community response, including the overall incident command structure.
- The Incident Commander (AOC) will assume responsibility of the Hospital Command Center and activate the appropriate positions noted on the Incident Management Team Chart.
 - Until the Incident Command System is in place, the Incident Commander will determine if the Labor Pool will be opened depending on the scope of the emergency. If the Labor Pool is not opened, the Incident Commander will inform the Patient Care Supervisor who may assign additional help to the Emergency Area as needed. Additional staff will be called in as needed via the callback system.
 - The Incident Commander, or designee, will notify the Switchboard Operator if "911" is to be called for additional outside agencies to assist the hospital in the event of an emergency.

A list of Emergency management codes along with the proper procedures to be followed are located in the Avera McKennan Hospital & University Health Center Emergency Management Plan, which may be accessed on Sharepoint, under the safety tab, which our employees and students can access at any time. Staff/students receive annual training on the e-learning connection for each of these codes. The list of potential disasters/emergencies is as follows:

- "Fire Alarm Alert in (Location)": Fire, smoke, or smell of something burning; fire alarms are activated.
- "Medical Emergency": Person needs immediate assistance – cardiac/respiratory arrest
 - ADULT in (Location -- > 12 yr or older)
 - PEDIATRIC in (Location -- < 12 yr old)
- "Trauma Team in ER": trauma team activation per protocol

- “Missing _____ Alert (give description) last seen in (Location)”: unknown location of patient/visitor
 - INFANT – CHILD - ADULT
- “A Tornado WATCH has been issued for Lincoln or Minnehaha County until (expiration time), please initiate safety precautions”: WARNING – conditions are right
- “A Tornado WARNING has been issued for Lincoln or Minnehaha County until (expiration time), please initiate safety precautions”: WARNING – been sighted or confirmed
- “Mass Casualties Alert in (location): influx of patients due to internal/external emergency that will challenge resources
 - Level I = Disaster with 14 or less anticipated seriously injured Victims.
 - Level II = Disaster with 15 or more anticipated seriously injured victims.
- “Hazardous Spill Alert in (location) – agent/description”: A small spill presenting no hazard to trained employees or to the environment
- “Evacuation Alert for (location)”: remaining in facility is more hazardous to health, like, or safety than exiting.; listen for further instruction (shelter in place, next smoke barrier, partial evac., etc)
- “Security Alert – Lockdown Facility: an Armed Individual is in (location)”: a hostage or armed individual with a weapon has entered the facility
- “Security Alert Staff Response in (location)”: escalating behavior, agitated individual – need show of force from additional staff presence/de-escalation
- “Security Alert Building Threat in (location)”: notified of a bomb, nuclear, or biological threat toward facility
 - CEO/VP/Incident Command will announce based on credibility of threat – will instruct action to take (shelter in place, commence search of dept., evacuate, etc.)
- “Message Alert: (state situation and location)”: general facility notification: medical gases, utility interruptions, vacuums, water

Notification Process / Timely Warnings

- Avera McKennan uses an internal phone system for internal communication of emergency situations. Staff is instructed to dial “55” on the phones for assistance with any type of emergency situation. The switchboard operators are the only ones permitted to contact “911” for external notification or assistance unless the AOC or Security designates another person to do so. In the event the internal systems fails, all departments critical to the provision of patient care have a “Red” bypass phone which utilizes the Qwest phone system.
- Avera McKennan utilizes two-way radio equipment for internal communications within the Facility Services Department (security and maintenance), the Environmental Safety staff and the Communications Center. All operators of the equipment are familiar with the equipment and have been trained in its use. External communication will be mostly with the EOC and other hospital command centers.

- Avera McKennan is also involved with the State of South Dakota digital radio system for external communications. Both the Emergency Department and the Command Center have access to this communication mode.

Evacuation Plan

When a situation occurs requiring evacuation of patients from threatened or affected areas, safety of lives is Avera McKennan's primary concern. Authority to order an evacuation is vested only in the Chief Executive Officer/or designee. Patients shall be evacuated to an area of safety by whatever means are available. Formal agreements are in place with ambulance services and neighboring facilities to transfer patients as necessary. All staff has been trained in evacuation procedures. Evacuation routes are posted throughout the hospital.

Procedure for Testing Emergency Response and Evacuation Procedure

- The Emergency Operations Plan (EOP) defines and integrates the facility's role with the communitywide emergency management efforts to promote inter-operability between the facility and the community.
- The Emergency Operations Plan shall be tested twice a year at each site included in the EOP, either in response to an actual emergency/disaster or in a planned exercise.
- Exercises shall be developed based on the hospital's Hazard Vulnerability Analysis (HVA) and shall evaluate the hospital's ability to handle communications, resources and assets, security, staff, utilities and patients. Exercises should validate the effectiveness of the EOP and identify opportunities to improve.
- One (1) exercise per year shall include an influx of volunteer or simulated patients for our organization as it offers emergency services and is a community-designated disaster receiving station. (Tabletop sessions are not acceptable.)
- At least one (1) exercise per year shall be escalated to evaluate how effectively the hospital performs when the hospital cannot be supported by the local community. (Tabletop sessions are acceptable to meet the community portion of this exercise.)
- If applicable, the hospital will participate in at least one (1) communitywide exercise annually that is relevant to the priority of emergencies identified in the hazard vulnerability analysis. (Tabletop sessions are acceptable to meet the community portion of this exercise.)
- The hospital shall designate an individual(s) to monitor the performance of the emergency response exercises and document opportunities for improvement.
- The Emergency Management Committee shall modify the hospital's Emergency Operations Plan based on the evaluations of the emergency response exercises and responses to actual emergencies/disasters. These improvements shall be communicated to staff as appropriate.
- Avera McKennan participates in all local, county and state emergency management drills. The Emergency Management Coordinator and the Director of Environmental Safety are members of the county wide emergency management system and coordinates with other agencies on any large scale exercises. (Exercises have been coordinated with the SD Air National Guard, SF Fire Rescue, SD National Guard Chemical Reserve Unit, City of Sioux Falls and SF Regional Airport Authority.)

- See Emergency Operations Plan – Exercises and Improvement Plan Policy, Job Action Sheets (JASs) Policy, List of HICS Available Job Action Sheets, and Hospital Command Center (HCC) Policy.