



Annual Campus Safety and Security

Report October 1, 2025

Table of Contents

<u>Message from the PAU Administration</u>	3
<u>About this Report</u>	3
<u>Campus Facilities</u>	4
<u>PAU Safety Policy</u>	4
<u>General Safety Awareness and Crime Prevention</u>	5
<u>Facilities Management</u>	6
<u>Reporting Crimes</u>	6
<u>Timely Warnings</u>	7
<u>Emergency Notification System</u>	8
<u>Relationships with Local Law Enforcement Agencies</u>	8
<u>Disclosure to Law Enforcement</u>	9
<u>Crime Prevention and Safety</u>	9
<u>Emergency Plan</u>	9
<u>Drug-Free Campus Policy</u>	10
<u>Drug-Free Workplace Act</u>	14
<u>Drug-Free Workplace Policy</u>	15
<u>Alcohol Policy</u>	15
<u>No Smoking Policy</u>	16
<u>Prohibition and Prevention of Sexual Misconduct</u>	17
<u>Public Information about Registered Sex Offenders</u>	17
<u>How Data is Gathered</u>	17
<u>Campus Crime Statistics</u>	18
<u>Hate Crime Statistics</u>	23
<u>Unfounded Crimes</u>	24
<u>Appendix A: Palo Alto Emergency Plan</u>	25
<u>Appendix B: Crime-Statistics-Categories</u>	26
<u>Appendix C: Crime Definitions</u>	27
<u>Appendix D: Partnering Colleges and Universities</u>	31
<u>Appendix E: Completion Certificate – 2024</u>	32

Message from the PAU Administration

Palo Alto University (“PAU”) is pleased to publish its Annual Campus Safety and Security Report.

In this report, you will find important information about PAU’s policies, personal safety and crime prevention, and where students, employees and visitors should go to report crimes. The Annual Campus Safety and Security Report also includes crime statistics as required under the Clery Act for the last three calendar years.

I encourage you to read this important information and to use it to enhance your experiences at PAU. All persons are strongly encouraged to immediately report crimes to the appropriate police agency. Prompt reporting will assure timely warning notices on campus and timely disclosure of crime statistics.

If you have any questions about this report, please direct your inquiries to Palo Alto University, Attn: Vice President for Finance and Operations, 1791 Arastradero Road, Palo Alto, CA 94304, Phone: 650-417-2203, Email: financeandops@palloaltou.edu.

About this Report

PAU is committed to the safety and well-being of our students, faculty, staff, independent contractors, volunteers, patrons, and all other members of our community.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, codified at 20 U.S.C. § 1092(f) as a part of the Higher Education Act of 1965 (the “Clery Act”), requires institutions of education who participate in federal student aid programs, to publish an annual security report as well as make timely warnings of any criminal activity. The Annual Campus Safety and Security Report includes crime statistics for the previous three years and policies adopted by the school to maintain and promote campus safety.

Under the oversight of the Chief Financial Officer/Vice President of Finance and Operations in the Office of Finance and Operations at PAU, information is collected on reportable crime data that makes up this report.

The Annual Campus Safety and Security Report is emailed to all current students, staff and faculty, and it is also available on PAU’s website at www.paloaltou.edu. PAU also informs prospective students and employees about the existence of this report.

Campus Facilities

Through strategic partnerships with the surrounding community, PAU's central location in the Silicon Valley provides opportunities for students to learn the psychological implications in the business environment locally and globally.

PAU operates two campuses: Allen Calvin Campus, which is located at 1791 Arastradero Road, Palo Alto, California 94304, and Mountain View Campus, which is located at 1172 Castro Street, Mountain View, California 94040.

The University also operates The Community Clinic, a psychology training clinic dedicated to providing compassionate counseling and psychotherapy services to adults, older adults, couples, adolescents, children, and families in Santa Clara County and San Mateo County. The Community Clinic is located at the Mountain View campus referenced above.

In addition, PAU partners with one other major university to offer a consortium degree program.

The location of the other partnering university is as follows:

- Stanford University, School of Medicine, Department of Psychiatry and Behavioral Sciences, 401 Quarry Road, Palo Alto, CA 94304

PAU students also conduct their clinical training at many external practicum sites and non-PAU training sites that are not owned or operated by PAU.

The policies and procedures stated herein and the procedures for reporting crimes are the same for all persons, regardless of whether they are on a PAU campus or studying or working at other external sites and locations affiliated with the University, unless otherwise specifically noted.

Please note: PAU does not have any on-campus or off-campus student housing facilities. Likewise, PAU does not have any on-campus or off-campus fraternity or sorority houses, or student organizations that extend beyond the University.

PAU Safety Policy

PAU is concerned about the safety and health of all members of the PAU community, and it has promulgated a Safety Policy and an Injury and Illness Prevention Program. Safety is everyone's responsibility. The following are guidelines for safety at PAU:

- Call 911 for help if you are injured or discover an injured person; and to report an emergency
- In addition to calling 911, notify the Facilities Director at 650-417-2033 or email at:

facilities@palou.edu.

- First-Aid kits and flashlights are located in the kitchen area located in both buildings
- Please notify the Facilities Department, 650-417-2033, facilities@palou.edu if the First-Aid supplies are incomplete or in need of replacements
- Learn the location of the nearest fire exit and fire extinguishers
- Do not put yourself at risk or in an unsafe condition under any circumstances
- Please notify your advisor, and the Facilities Department if you discover an unsafe condition
- Report all incidents, no matter how minor, to the People Operations department by email peopleoperations@palou.edu, or by phone 650-417-7530. For matters involving sexual misconduct, there are two reporting options: a) reports can be submitted anonymously by using the [Sexual Misconduct/Title IX Report](#) available on PAU's webpage or b) by submitting a written complaint by email to the Title IX Coordinator, titleix@palou.edu.
- No smoking is not allowed on campuses
- Always use common sense

It is the policy of PAU that everyone is free to speak to anyone regarding safety without reprisal and with full anonymity.

General Safety Awareness and Crime Prevention

Members of the University community are advised to be alert to their surroundings and aware of measures they can take to increase their personal safety and guard their personal possessions.

Be aware of persons loitering for no apparent reason in parking areas, walkways, entrances and exits, and service areas. Report any suspicious persons to the University as described in the Reporting Procedures described below.

In the evenings, people are encouraged to walk in groups and use heavily traveled and well-lit streets. Do not leave valuable items unattended.

Facilities Management

PAU's Facilities Department is responsible for the upkeep of the campus buildings and serves as the primary liaison with the PAU Finance and Operations division for the matters occurring on and adjacent to PAU's campuses. This Facilities Department performs regular maintenance to ensure a safe environment. In collaboration with the PAU Administration, the Facilities Department performs routine inspections to detect potential hazards and perform timely repairs.

PAU does not operate a campus safety department, nor does it staff its campuses with campus safety officers or private security officers.

However, the partnering university may operate a campus safety department and/or employ campus safety/private security officers on their campus. For more information about the campus security of the non-campus partnering colleges and universities, please refer to the websites of the partnering colleges and universities, as listed in Appendix D.

Reporting Crimes

PAU encourages all students, faculty, staff and guests to report crimes as soon as possible to law enforcement. Prompt reporting is the best option to ensure preservation of evidence and for the identification and location of witnesses.

PAU also encourages all students, faculty, staff and guests to report crimes to the University and to do so to the University's designated officers described below. PAU also encourages students to report on a voluntary, confidential basis to the University, for both timely warnings and for the annual statistical disclosure. Please note, the filing of a report to the University is independent of a report to law enforcement, and the University strongly encourages all persons to report crimes to law enforcement in addition to reporting to the University.

Any suspicious activity or person seen in the parking lots or loitering around vehicles, inside buildings or around campus property should promptly be reported to the police and to the University.

To Report a Crime:

A. Emergency and External Reporting Options (Non-University):

On-Campus (Allen Calvin Campus or Mountain View/The Community Clinic Campus):

- For Emergencies, Dial 9-1-1
- City of Palo Alto Police Department: Emergency (650) 321-4433 or Non-Emergency (650) 329-2413; Website: <https://www.paloalto.gov/Departments/Police>

- City of Mountain View Police Department: Emergency 9-1-1; or Non-Emergency (650) 903-6344; Website: <https://www.mountainview.gov/our-city/departments/police>

Off-Campus (Campus of an Affiliated School of PAU):

- For Emergencies, Dial 9-1-1
- City of Palo Alto Police Department: Emergency (650) 321-4433 or Non-Emergency (650) 329-2413; Website: <https://www.cityofpaloalto.org/Departments/Police>
- City of Mountain View Police Department: Non-Emergency (650) 903-6344; Website: <https://www.mountainview.gov/our-city/departments/police>
- Stanford University Department of Public Safety: Non-Emergency (650) 329-2413; Website: <https://police.stanford.edu>

B. Reporting Options at the University

- | | |
|---------------------------------|----------------|
| 1. People Operations Department | (650) 417-7530 |
| 2. Facilities Department | (650) 417-2033 |

Please see the [PAU Student Sexual Misconduct Policy](#), linked on page 16 below for additional reporting options for matters involving sexual misconduct, including how to make an anonymous report and for a list of additional resources.

Timely Warnings

PAU issues timely warnings and advisories to students, faculty and staff, in the event that a situation arises, either on or off campus, that, in the judgment of PAU administration, constitutes an ongoing or continuing threat.

The warning will be issued through PAU's email system to students, faculty and staff.

Depending on the particular circumstances of the situation, the PAU administration may also post a notice on PAU's Emergency Notification System, "PAU Alert". "PAU Alert" is an electronic alert system that allows University officials to contact you during an emergency by sending messages to you via email, text message, voice message, or RSS feed. Please see below for information on the "PAU Alert" Emergency Notification System.

Emergency Notification System

In the event of an emergency, please call 911.

Omnilert is PAU'S emergency alert system, managed by the IT Department in the Division of Finance and Operations, which sends an SMS text and/or email notification to the PAU community in the event of urgent or emergency situations affecting PAU (i.e. power outages, email outages, road closures, campus closures etc.).

All current staff, faculty and students are automatically enrolled in the system with their PAU email address and/or mobile phone number that is on file.

Please note that this system will only be used to notify the PAU community of emergency situations. It will not be used for routine reminders (such as registration deadlines, etc.).

Individuals may manage their Omnilert account by going to OneLogin (paloaltou.onelogin.com), and by clicking on the "PAU Alert" icon pictured here:



By clicking on the "Services" tab, individuals may update their SMS phone numbers and email addresses that they wish to receive alerts on. After adding a new number or email address, you will receive an SMS text or email to validate them. Follow the instructions in the text or email to ensure your information is updated. By clicking on the "Groups" tab, individuals may subscribe and unsubscribe to various notification groups.

If you have any questions or need additional information, please contact the IT Department at support@paloaltou.edu or visit the Omnilert FAQ site.

Relationships with Local Law Enforcement Agencies

PAU has a positive working relationship with the Palo Alto Police Department and the Mountain View Police Department. PAU cooperates with local law enforcement agencies when incidents arise that require investigative efforts, resources, crime related reports and exchanges of information, as determined by PAU or the law enforcement agency. PAU will work on hopes to memorializing these working relationships into a formal memorandum of understanding in the near future.

Disclosure to Law Enforcement

PAU is required by state law to report to law enforcement any incident that it learns of that might be classified as a violent crime, hate crime, or sexual assault. This requirement extends to all “Campus Security Authorities,” which includes any official of PAU who has significant responsibility for student and campus activities, which includes the People Operations Department, the Department of Student Success, any Director, Faculty Advisor, Department Head or Academic/Student Success staff member.

Any employee of PAU who becomes aware of a crime involving PAU or a member of the PAU community should immediately report the incident to the People Operations Department or the Facilities Department, as described above. PAU will report the matter to law enforcement consistent with state law.

Crime Prevention and Safety

The University’s Administration collaborates with students, faculty and staff to address safety. The University also offers safety presentations by representatives from various public and private organizations, in an effort to prevent crimes and increase safety.

As part of PAU’s crime prevention and safety efforts, the Finance and Operations Division at PAU maintains records of reported crimes occurring on and around campus.

In addition, during orientation, students are informed of services offered by the University, including information on campus safety and the University’s policy prohibiting sexual misconduct.

A common theme of awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the security of others.

Emergency Plan

PAU has promulgated the “Palo Alto University Emergency Plan” to protect life and health, minimize property and economic damage, and to maximize restoration of normal activities for the campus community. Refer to Appendix A for a full description of that plan.

If a crime is in progress:

1. Do not put yourself at risk.
2. Do not interfere with persons committing the crime or creating the disturbance.
3. If you are the victim of, are involved in, or witness any on-campus violation of the law such as assault, robbery, theft, overt sexual behavior, call the police by dialing 9-1-1 and report the following information:

- Nature of incident
 - Location of incident
 - Description of person(s) involved
 - Location of person(s) involved
 - Your name, location, department and phone number
4. If personal safety allows, try to get a good description of the criminal. Note height, weight, sex, color, approximate age, clothing, method and direction of travel, and name if known.
 5. Remain where you are until a police officer arrives.

Drug-Free Campus Policy

Health Risks

It is widely recognized that the misuse and abuse of drugs (“controlled substances”[1]) and the abuse of alcohol are major contributors to serious health problems as well as to social and civic concerns. The health risks associated with the use of illicit drugs and the abuse of alcohol include various deleterious physical and mental consequences including addiction, severe disability, and death. Information concerning the known effects of alcohol and specific drugs can be found in Department of Education literature available through the PAU Library.

Federal Legislation

In response to these concerns, the U.S. Congress passed the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Amendments of 1989. In accordance with these Acts, PAU has enacted the following policy applicable to all employees and students.

Policy

It is the policy of PAU to maintain a drug-free workplace and campus. PAU prohibits, on its campus and property and in the workplace, the sale, distribution, possession, manufacturing, or attempt to obtain or use of a dangerous drug, restricted drug, narcotic, or other controlled substance as those terms are used in California statutes, except when lawfully prescribed pursuant to medical or dental care.

The workplace and campus are presumed to include all PAU premises where activities of the University are conducted. Violation of this policy may result in disciplinary sanctions up to and

including termination of employment or dismissal of students. Violations may also be referred to the appropriate authorities for prosecution. This policy will be reviewed biennially.

Student Employees

As a condition of employment, all PAU employees are required to follow this policy. Employees who unlawfully manufacture, distribute, dispense, possess or use controlled substances or unlawfully use, possess, or distribute alcohol in the workplace, on the campus, or as part of any University activity shall be subject to discipline up to and including discharge from employment and, where appropriate, may be referred for prosecution.

An employee who is convicted (including a plea of nolo contendere) of a criminal drug statute violation occurring in the workplace must, within five days thereafter, notify PAU of such conviction by informing the employee's supervisor (for staff) or the People Operations Department, peopleoperations@palloalto.edu, (650) 417-7530.

[1]Controlled substances are those defined in 21 U.S.C. 812 and include, but are not limited to, such substances as marijuana, heroin, cocaine and amphetamines.

Individuals who are not PAU employees, but who perform work at PAU for its benefit (e.g., independent contractors, temporary employees provided by agencies, visitors engaged in joint projects at PAU, volunteers and so forth) are required to comply with this policy. Such individuals who unlawfully manufacture, distribute, dispense, possess or use controlled substances or unlawfully use, possess, or distribute alcohol in the PAU workplace may be barred from further work for and at PAU.

Students

Students who unlawfully distribute, possess or use controlled substances or alcohol in the workplace, on the campus, or as part of any University activity may be subject to discipline up to and including dismissal and, where appropriate, may be referred for prosecution.

Drug Testing

The practice of behavioral health involves, at its core, the welfare and protection of the patient or client. Those who practice have an obligation to take reasonable steps to avoid harming the patient or client and to hold themselves to the highest ethical standards in their professional or educational activities. During their training, students are required to practice in practicum or internship activities where the welfare and protection of the patient or client is critical due to the high ethical standards set in the fields of psychology, counseling, and social work, as well as the public health and safety-sensitive nature of the practice.

Where there is a reasonable suspicion of drug use by PAU students, they may be subject

to discipline or dismissal for improper behavior and/or may be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If they are unable to explain their behavior, they may be required to take an independent drug test and/or to undergo appropriate rehabilitation as a condition of maintaining student status.

“Reasonable suspicion” includes a suspicion that is based on personal observations such as a student’s manner, disposition, muscular movement, appearance, behavior, speech, or breath odor; on information provided to the Director of Clinical Training or the Department of Student Success by PAU faculty members or staff, or by other persons believed to be reliable; or on other surrounding circumstances.

PAU will pay the cost for the administration of an independent test and for reasonable transportation to the testing facility. The student will have the opportunity to alert the clinic or laboratory personnel to any prescription or non-prescription drugs that he/she has taken, which may affect the outcome of the test. All drug testing will be performed by urinalysis.

Students who refuse to undergo the drug test or students who test positive for a controlled substance and refuse to undergo, or complete rehabilitation may be subject to discipline up to and including dismissal.

All drug testing records will be treated as confidential.

Rehabilitation (Students and Student Employees)

Successful completion of an appropriate rehabilitation program (including participation in aftercare) may be considered as evidence of eligibility for continued or future employment or for reinstatement of student status.

Guide to Supervisors of Student Employees

Responsibility for effective implementation and enforcement of PAU’s Drug-Free Workplace Policy and Alcohol Policy begins with supervisors. Supervisors must be alert to indications or evidence of the use or presence of controlled substances or alcohol in the workplace.

Communication

Supervisors must make sure that every employee is aware of PAU’s Drug-Free Workplace Policy and Alcohol Policy and understands that violation of these policies is a serious matter and cause for disciplinary action including possible termination of employment. Supervisors must assure that a copy of this Policy is posted in the work area and that each new employee is given a copy. A copy of this policy is published in the Faculty, Employee, and [Student Handbooks](#).

Presence of Controlled Substances or Alcohol in the Workplace

PAU prohibits in the workplace, the sale, distribution, possession, manufacturing, or attempt to obtain or use of a dangerous drug, restricted drug, narcotic, or other controlled substance as those terms are used in California statutes, except when lawfully prescribed pursuant to medical or dental care. The unlawful presence of any controlled substance or alcohol in the workplace itself is prohibited.

If and when an employee is suspected of violating this policy, the supervisor should consult with their immediate manager or the People Operations Department if the case involves the manager, to plan and carry out an appropriate investigation and resolution of the situation.

Impaired Performance on the Job/Unlawful Use of Controlled Substances or Alcohol in the Workplace

Performance problems on the job can have many causes. In discussions with an employee concerning any performance problem, the supervisor should offer to help the employee determine the source of the problems and offer guidance on appropriate assistance, counseling, or other resources.

When job performance has become impaired, the supervisor should take normal corrective action, beginning with discussion with the employee. When the behavior of an employee on the job raises safety concerns for the employee and/or others in the workplace, the supervisor must take immediate action to assess the situation; in such cases employees must not be allowed to continue on the job. Specific actions to be taken depend upon the facts of the particular situation.

In a situation in which an employee acknowledges to the supervisor that poor performance or unacceptable conduct results from substance abuse, the supervisor should urge the employee to seek help from a qualified substance abuse treatment resource. If the employee chooses to seek help, they should be referred to appropriate sources. If the employee requests a leave of absence for a rehabilitation program, the supervisor should take normal steps to review the request for such a leave. Supervisors should make reasonable accommodation consistent with operational requirements.

If the employee demonstrating poor performance or unacceptable conduct claims causes other than substance abuse are causing the problem, or does not elect to seek help for whatever is the cause of the problem, the supervisor first should counsel the employee in the ways their actions on the job need improvement or are unacceptable. If improvement does not take place, the employee should be warned that the poor performance can result in discipline, including termination of employment. Managers should consult with their supervisors to decide upon an appropriate form of action.

Reporting of Convictions

Employees who are convicted of a criminal drug statute violation occurring in the workplace must report the conviction directly, or through their supervisor to People Operations for appropriate action as required by PAU policy and/or law.

Getting Help

Employees who are concerned about substance use, abuse, and rehabilitation are strongly urged to contact their family physicians or People Operations who can refer them to appropriate resources (community or private agencies) that provide complete, confidential substance abuse counseling.

Students (including employees who are also PAU students) are urged to contact the Clinic Director or their family physician for appropriate referral sources.

Free Speech

Every student has the right under appropriate circumstances and subject to the other rules, policies and procedures of the University to: speak freely, listen to others, assemble in public meetings and express themselves. Because these rights are for each member of the community, it follows that no student may prevent or disrupt an exercise of such rights by others, or to disrupt a University activity or damage university or community member property, whether the persons involved are expressing approval or disapproval of an idea or action. In the exercise of speech or demonstration no or group is permitted to disrupt the normal operation of the University.

Drug-Free Workplace Act

The University complies with the requirements of the Drug-Free Workplace Act of 1988, which is a part of Public Law 100-690, Anti-Drug Abuse Act of 1988. The federal Drug-Free Workplace Act of 1988 (§ 5152) covers grants and contracts for the procurement of any service with a value of \$25,000 or more.

To comply with the act, federal agency contractors and federal grant recipients must provide a drug-free workplace. These federal contractors and grant recipients will:

- Publish a statement prohibiting the unlawful manufacture, distribution, dispensation, possession, or use of illegal drugs in the workplace and specify the actions that will be taken against employees for violations.
- Distribute a copy of the policy statement to employees engaged in the performance of a federal grant or contract.
- Notify employees that compliance with the policy is a condition of employment on such grant or contract and that employees must abide by the terms of the policy statement. The policy statement includes the requirement that employees must notify the University of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

- Notify the granting or contracting agency within 10 days after learning of a criminal drug statute conviction.
- Impose a sanction as required under this act on employees who are so convicted.
- Establish a program of drug-free awareness, informing employees about the organization's policy of maintaining a drug-free workplace, the penalties that may be imposed upon employees for drug- abuse violations, the dangers of drug abuse in the workplace, and any available drug counseling, rehabilitation, and assistance programs.
- Make a good faith effort to continue to maintain a drug-free workplace through implementation of these requirements.

Drug-Free Workplace Policy

The University, in compliance with the federal Drug-Free Workplace Act of 1988, has adopted the following policy that must be adhered to as a condition of employment:

- The unlawful use, possession, manufacture, dispensation, or distribution of controlled substances in all work locations is prohibited.
- Any employee convicted of a criminal drug statute violation occurring in the workplace must notify their manager and People Operations of the conviction within five days after the conviction. As required by the federal Drug-Free Workplace Act of 1988, the University must inform contracting or granting agencies of such convictions within 10 days after receiving notification or otherwise receiving notice of a conviction.
- Upon receiving such notification, the University, in conjunction with the location concerned, will take all steps necessary to assure the proper conduct of sponsored projects and programs. If a decision is reached to allow the affected individual to continue employment with the University, the individual must participate in, and satisfactorily complete, an approved drug abuse assistance or rehabilitation program.

The University will evaluate its obligations in accordance with state and other applicable laws where required, on a case-by-case basis.

Alcohol Policy

Palo Alto University is committed to providing a safe, healthy, and productive work environment. Consistent with this commitment, it is the intent of the University to maintain an alcohol-free workplace. Being under the influence of alcohol while on the job may pose a serious health and safety risk to others, which will not be tolerated.

The University may sponsor social or business-related events where alcohol may be served. This policy does not prohibit the use or consumption of alcohol at these events. However, if you choose to consume alcohol at such events, you must do so responsibly and legally.

Prohibited Conduct

The University expressly prohibits employees from engaging in the following activities when they

are on duty or conducting University business or on University premises (whether or not they are working):

- The use, abuse, or being under the influence of alcohol, illegal drugs, or other impairing substances.
- The possession, sale, purchase, transfer, or transit of any illegal or unauthorized drug, including prescription medication that is not prescribed to the individual or drug-related paraphernalia.
- The illegal use or abuse of prescription drugs.

While the use of marijuana has been legalized under some state laws for medicinal and recreational uses, it remains an illegal drug under federal law and its use, as it affects the workplace, is prohibited by University policy. The University does not discriminate against employees solely because of their off-duty use of medical marijuana in compliance with California state medical marijuana law. You may not consume or be under the influence of marijuana while on duty or at work, even if you have a valid prescription for medical marijuana.

Nothing in this policy is meant to prohibit your appropriate use of over-the-counter medication or other medication that can legally be prescribed under both federal and state law, if it does not impair your job performance or safety or the safety of others. If you take over-the-counter medication or other medication that can legally be prescribed under both federal and state law to treat a disability, inform your manager and People Operations if you believe the medication may impair your job performance, safety, or the safety of others or if you believe you need a reasonable accommodation before reporting to work while under the influence of that medication.

Treatment and Rehabilitation

The University may assist you in seeking treatment or rehabilitation for drug or alcohol dependency. In such cases, the University may consider your continued employment as long as concerns regarding safety, health, production, communication, or other work-related matters are adequately addressed. The University may also require you to obtain a medical clearance and agree to random testing and a "one-strike" rule as a condition of continued employment.

Violations

A violation of this policy may result in disciplinary action, up to and including termination of employment.

No Smoking Policy

Palo Alto University is a 100% tobacco-free, smoke-free and vapor-free campus. California law prohibits smoking in the workplace (Cal. Labor Code 6404.5.)

Smoking is expressly prohibited at any time on Palo Alto University property. Smoking is not allowed in enclosed spaces or outside while on campus property.

Smoking means inhaling, exhaling, burning, or carrying any lighted or heated cigar, cigarette, pipe, or any other lighted or heated tobacco or plant product intended for inhalation, whether natural or synthetic, in any form. Smoking includes the use of an electronic smoking device that creates an aerosol or vapor, in any manner or in any form, or the use of any oral smoking device for

circumventing the prohibition of smoking.

Tobacco product means a product containing, made, or derived from tobacco or nicotine that is intended for human consumption, whether smoked, heated, chewed, absorbed, dissolved, inhaled, snorted, sniffed, or ingested by any other means, including, but not limited to, cigarettes, cigars, little cigars, chewing tobacco, pipe tobacco or snuff; an electronic device that delivers nicotine or other vaporized liquids to the person inhaling from the device, including, but not limited to, an electronic cigarette, cigar, pipe, or hookah; any component, part, or accessory of a tobacco product, whether or not sold separately. Tobacco product does not include a product that has been approved by the U.S. Food and Drug Administration for sale as a tobacco cessation product.

Prohibition and Prevention of Sexual Misconduct

PAU is committed to maintaining its campus community as a place which is free from all forms of sexual misconduct. All forms of sexual misconduct are prohibited, including sexual and gender-related: violence, assault, harassment, domestic violence, dating violence, and stalking.

The PAU Sexual Misconduct Policy can be found on the PAU Employee and Student Portals:

https://docs.google.com/document/d/1WLKthLMla7maU_IWyKqf6Y_6irzoorAd/edit

Public Information about Registered Sex Offenders

34 CFR 668.46(b)(12)

In 1947 California implemented a sex offender registration program to help keep track of persons convicted of certain sex crimes. Then in 1996, California enacted Megan's Law, which provides the public with photographs and descriptions of convicted sex offenders who have registered their whereabouts with local law enforcement. Pursuant to Section 290 of the California Penal Code convicted sex offenders are required by law to register within 5 days of changing residence locations (every 60 days if they do not have a permanent residence), starting school, employment at a school, or within 5 days of each birthday. If there are requests about registered sex offenders, contact the California Department of Justice Website: (<http://oag.ca.gov/>); or Megan's Law Information on Registered Sex Offenders: (<http://www.meganslaw.ca.gov>).

How Data is Gathered

The University collects statistical crime data for Clery-defined crimes that occur on PAU's main campus and on all public property that is immediately adjacent to and accessible from the campus.

The University also collects statistical crime data for Clery-defined crimes that occur at off-campus locations, if they occur in any building of property owned or controlled by PAU that is used in direct support of, or in relation to, the educational purposes of PAU, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

Statistical data for crimes is collected from the Palo Alto Police Department, the Mountain View Police Department, and other agencies as needed. In addition, the PAU community is directed to refer all reports to the People Operations Department of PAU. The CFO/VP of Finance and Operations then reviews the report to identify the classification of the crime, if any.

Campus crime, arrest and referral statistics include those reported to designated campus officials (including but not limited to administrators, directors, deans, department heads, advisors, facilities personnel), and local law enforcement agencies.

Campus Crime Statistics

Every year, PAU is required to report and disclose statistical data on Clery reportable crimes for the three most recently completed calendar years, if they occur on (1) on campus, (2) on public property within or immediately adjacent to the campus, and (3) in or on non-campus buildings or property that PAU owns or controls. This is also known as the University's "Clery geography."

Clery crimes that do not occur within the University's Clery geography are not included in the data even if students or employees of PAU are involved.

ALLEN CALVIN CAMPUS – On Campus Crime Reports

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor Vehicle theft	0	0	0

Arson	0	0	0
Violence Against Women Act			
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

Referrals for Disciplinary Action	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

ALLEN CALVIN CAMPUS – Public Property Crime Reports (Immediately Adjacent to and Accessible from this campus)

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0

Burglary	0	0	0
Motor Vehicle theft	0	0	0
Arson	0	0	0
Violence Against Women Act			
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

Referrals for Disciplinary Action	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

MOUNTAIN VIEW/ CASTRO CAMPUS – On Campus Crime Reports

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0

Burglary	0	0	0
Motor Vehicle theft	0	0	0
Arson	0	0	0
Violence Against Women Act			
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

Referrals for Disciplinary Action	2022	2023	2204
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

MOUNTAIN VIEW/CASTRO CAMPUS – Public Property Crime Reports (Immediately Adjacent to and Accessible from this campus)

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0

Aggravated assault	0	0	0
Burglary	0	0	0
Motor Vehicle theft	0	0	0
Arson	0	0	0
Violence Against Women Act			
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

Referrals for Disciplinary Action	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

**OFF-CAMPUS Locations of the University
(Or Non-campus Building or Property)**

Criminal Offense	2022	2023	2024
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0

Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor Vehicle theft	0	0	0
Arson	0	0	0
Violence Against Women Act			
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	1*	0	0
Weapons Violations	0	0	0

Referrals for Disciplinary Action	2022	2023	2024
Liquor Law Violations	0	0	0
Drug Abuse Violations	0	0	0
Weapons Violations	0	0	0

**occurred on public property adjacent to PAU's previous campus location that was vacated in August 2022 (5150 El Camino Real, Los Altos, CA)*

Hate Crimes Statistics

Current legislation requires the reporting of crimes listed in the tables above, plus the crimes of larceny/theft, simple assault, intimidation, destruction/damage/vandalism of property, if they are

also a Hate Crime. A Hate Crime is a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim based on their actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, or disability.

No crimes motivated by hate were reported to PAU in 2022, 2023, and 2024 for on campus, non-campus locations, or public property adjacent to the University.

Unfounded Crimes

Current legislation, beginning in 2015, requires the reporting of unfounded crimes. An "unfounded crime" is a reported crime that upon investigation by law enforcement authorities is found to be false or baseless. Only sworn or commissioned law enforcement personnel may "unfound" a crime. Crime reports can be properly determined to be false only if the evidence from a complete and thorough investigation establishes that the crime reported was not, in fact, completed or attempted in any manner.

The University has no reports of unfounded crimes in 2022, 2023, 2024 for on campus, non-campus locations, or public property adjacent to the University.

APPENDIX A

Palo Alto Emergency Plan

The PAU Emergency Plan can be found on the PAU Employee and Student Portals:

https://my.paloalto.edu/ICS/Employee_Portal/Health_and_Safety/Emergency_Procedures/Emergency_Procedures.jnz

Note: The PAU Employee and Student Portals are internal access points. If you need access, please contact facilities@paloalto.edu.

APPENDIX B

Crime Statistics-Categories

Crimes are reported in the following 4 major categories, with several sub-categories:

1. Criminal Offenses:
 - a. Criminal homicide: murder and non-negligent manslaughter, manslaughter by negligence
 - b. Sexual assault: rape, fondling, incest, statutory rape
 - c. Robbery
 - d. Aggravated assault
 - e. Burglary
 - f. Motor vehicle theft
 - g. Arson
2. Arrests or referrals for disciplinary action:
 - a. Liquor law violations
 - b. Drug abuse violations
 - c. Weapons law violations (carrying, possession, etc)

If both an arrest and a referral are made only the arrest is counted. The statistics are also broken down geographically into “on campus,” “residential facilities for students on campus,” “non - campus buildings,” or “on public property” such as streets and sidewalks.

3. VAWA Offenses:
 - a. Domestic violence
 - b. Dating violence
 - c. Stalking
4. Hate Crimes:
 - a. Larceny-theft
 - b. Simple assault
 - c. Intimidation
 - d. Destruction/damage/vandalism of property
 - e. Any of the above-mentioned offenses that were motivated by bias

The reports must also indicate if any of the reported incidents were a “hate crime.” An institution must report, by category of prejudice, crimes reported to local police agencies or to a campus security authority that manifest evidence that the victim was intentionally selected because of the

victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability.

APPENDIX C

Crime Definitions

Federal Bureau of Investigation Uniform Crime Reporting/National Incident - Based Reporting System Crime Definitions

Excerpted from the Implementing Regulations of the "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act" (originally the Campus Security Act) originally published in the Federal Register on April 29, 1994 (Vol. 59, No. 82) and November 1, 1999 (Vol. 64, No. 210).

The following definitions are to be used for reporting the crimes listed in 34 CFR sec. 668.46 and 34 Appendix A to Subpart D of Part 668, in accordance with the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Program. The definitions for murder, rape, robbery, aggravated assault, burglary, motor vehicle theft, weapon law violations, drug abuse violations and liquor law violations are excerpted from the Summary Reporting System (SRS) User Manual" from the FBI's UCR Program . The definitions of fondling, incest, and statutory rape are excerpted from the "National Incident-Based Reporting System (NIBRS) User Manual" from the FBI's UCR Program. The definitions of larceny-theft (except motor vehicle theft), simple assault, intimidation, and destruction/damage/vandalism of property are from the "Hate Crime Data Collection Guidelines and Training Manual" from the FBI's UCR Program.

CRIME DEFINITIONS FROM THE SUMMARY REPORTING SYSTEM (SRS) USER MANUAL FROM THE FBI'S UCR PROGRAM

Arson

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

Criminal Homicide-Manslaughter by Negligence

The killing of another person through gross negligence.

Criminal Homicide-Murder and Non-negligent Manslaughter

The willful (non-negligent) killing of one human being by another.

Rape

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

Robbery

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

Aggravated Assault

An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)

Burglary

The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition now includes three conditions: (1) there must be evidence of unlawful entry (trespass). (2) The unlawful entry must occur within a structure, which is defined as having four walls, a roof, and a door. (3) The unlawful entry into a structure must show evidence that the entry was made in order to commit a felony or theft. If the intent was not to commit a felony or theft, or if the intent cannot be determined, the proper classification is Larceny.

Motor Vehicle Theft

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

Weapons: Carrying, Possessing, Etc.

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

Drug Abuse Violations

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

Liquor Law Violations

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

CRIME DEFINITIONS FROM THE NATIONAL INCIDENT-BASED REPORTING SYSTEM (NIBRS) USER MANUAL FROM THE FBI'S UCR PROGRAM

Sex Offenses

Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

- A. Fondling – The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- B. Incest – Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- C. Statutory Rape – Sexual intercourse with a person who is under the statutory age of consent.

Violence Against Women Act of 1994 (VAWA), 34 CFR 668.46(a):

Domestic Violence

A felony or misdemeanor crime of violence committed –

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

Dating Violence

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

- (i) The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- (ii) For the purposes of this definition-
 - (A) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - (B) Dating violence does not include acts covered under the definition of domestic violence.

Stalking

- (i) Engaging in a course of conduct directed at a specific person that would cause a reasonable person to –
 - (A) Fear for the person's safety or the safety of others; or

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

Hate Crimes:

Larceny-theft

The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

Simple Assault

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

Intimidation

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

Destruction, damage, or Vandalism of property

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

Source: Federal Register, April 29, 1994, Vol. 59, No. 82; Federal Register, November 1, 1999, Vol. 64, No. 210.

APPENDIX D

Partnering Colleges and Universities

Stanford University, Stanford University Department of Public Safety (SUDPS): 650- 329-2413, or 9-1-1; <https://police.stanford.edu/>

APPENDIX E

Completion Certificate

Campus Safety and Security Survey Completion Certificate

The Campus Safety and Security data for

Palo Alto University

(120698)

were completed and locked on **October 1, 2025**.

Thank you for your participation in the 2025 data collection.

This certificate was prepared on **October 1, 2025**