



2025 Annual Safety and Security Report

This information is provided in compliance with federal law, known as the Clery Act and Violence Against Women Act (VAWA), to students and employees of Academia Medical Institute by October 1, 2026.

TABLE OF CONTENTS

SECTION I - ANNUAL SECURITY REPORT PURPOSE	7
Introduction	7
Background	7
SECTION II – PREVENTION AND AWARENESS PROGRAMS	8
Security Awareness and Crime Prevention	8
Prevention and Awareness Programs	8
Reducing Risk	8
Bystander Intervention	9
Crime Definitions	9
Crime Statistics for Academia Medical Institute	12
SECTION III – BASIC PROVISIONS AND COMPLIANCE REQUIREMENTS	14
Basic Provisions of the Clery Act	14
Specific Requirements that Do Not Apply to Academia Medical Institute	14
Security Awareness and Crime Prevention Strategies	14
Academia Medical Institute Emergency Procedures	16
INCIDENT SPECIFIC PROCEDURES	17
CONTINUITY OF OPERATIONS IN THE EVENT OF AN EMERGENCY	19
POLICIES	19
SECTION IV – CAMPUS GEOGRAPHY AND REQUIREMENTS OF THE CLERY ACT	20
Compliance Requirements - Timeframes	20
Clery Act	20
Regulatory Audits and Penalties for Non-Compliance	20
“On-Campus Geography” and “Public Property Geography” – Defined	21
Geographical Areas for Academia Medical Institute	21
Academia Medical Institute Campus	21
Common Areas/Public Property Geography	21
Non-Campus Buildings or Property	22
Clery Act Requirements for Special Events Sites – Reporting Not Required	22
SECTION V – CRIME STATISTICS AND CRIME CLASSIFICATIONS FOR CLERY ACT REPORTING	22
Policy for Reporting Crimes and Incidents Not Covered by the Clery Act	22
Reporting Procedures – Students	22
Reporting Procedures – Employees	23

Protecting the Confidentiality of Crime Victims	23
Classifications of Reportable Crimes under the Clery Act	23
Determining Whether a Criminal Incident is Reportable under the Clery Act	23
Revising Reports – False/Unfounded Crime Reports	24
How to Classify Specific Crimes for Clery Act Reporting	24
Investigation Procedures	25
Informal Resolution Process	26
Formal Resolution Process	26
Investigator Qualifications	27
Sanctions: Corrective Actions	27
Notification of Outcome	28
Right to Appeal	28
Prohibition Against Retaliation	28
Confidentiality	29
Fabricated Allegations	29
SECTION VI – CAMPUS SECURITY AUTHORITIES / REPORTING DUTIES	30
Obtaining Information from Local Law Enforcement Agencies	30
“Campus Security Authorities” under the Clery Act	30
Duties of the Campus Security Authorities at Academia Medical Institute	30
Duties of the Campus Security Authority Coordinator	30
Security of the Academia Medical Institute Campus	31
Records and Statistics of Campus Police and/or Security Departments	31
Records and Statistics of Local Law Enforcement Agencies	31
Obtaining Crime Statistics Information – Responsibility	31
Refusal to Provide Crime Statistics Information	32
Scope and Content of Crime Statistics Information	32
SECTION VII – DAILY CRIME LOGS AND FIRE LOGS / FIRE AND RESCUE AGENCY PROCEDURES	33
Daily Crime Logs	33
Daily Fire Logs	33
Academia Medical Institute Policy Regarding Fire Records / Contact with Fire & Rescue Officials	33
SECTION VIII– EMERGENCY NOTIFICATIONS AND TIMELY WARNINGS REQUIREMENTS	34
Emergency Situations	34
Order to Evacuate the Campus – Compliance Required	34
Compliance with Administrative Staff Orders in an Emergency	34
Compliance with Law Enforcement and/or Fire and Rescue Personnel Orders	34

Disclosing the School's Emergency Procedures – Required	35
Notification of an Emergency Situation on Campus – Notifying Students and Staff	35
Notifying Outside Agencies of an Emergency Situation on Campus	35
Critical Incident – All Employees and Students Shall Make Immediate Notification	35
Notifying the Building Security of an Emergency Situation on Campus	36
Testing Emergency Procedures	36
Timely Warnings – Defined	36
Timely Warnings – When are they Required	36
Academia Medical Institute Policy – Issuing Timely Warnings	37
Who Shall Issue Timely Warnings	37
How Timely Warnings Shall be Made	37
Timely Warnings – Official Record	37
Timely Warnings and FERPA Compliance	37
Academia Medical Institute Missing Student Notification Policy & Missing Student Procedure	38
Purpose	38
Policy	38
Missing Student Procedure	38
SECTION IX – SEX OFFENSE PREVENTION / SEX OFFENDERS	40
Academia Medical Institute Policy – Sex Offense Prevention Program	40
Procedure for Dealing with a Report of Sexual Harassment and Sex Offenses	41
Victims of Criminal Sex Offenses – On-Campus and Off-Campus Counseling	41
Notification to Law Enforcement of an Alleged Criminal Sex Offense	42
Identifying Potential Witnesses	42
Preservation of Evidence – Employees' Responsibilities	42
Rendering Assistance to Victims and Witnesses	43
Sex Offenses on Campus – Media Relations	43
Actions to be Taken in the Aftermath of a Criminal Sex Offense on Campus	43
School Disciplinary Actions in Cases of Criminal Sex Crimes	43
Registered and/or Convicted Sex Offenders	44
Disciplinary Investigation Required	44
Disciplinary Investigation – Panel Composition	44
Disciplinary Investigation – Right to Call Witnesses and Present Evidence	44
Findings and Decisions of the Disciplinary Investigation – Duty to Notify	44
Criminal Sexual Offenses Committed by Academia Medical Institute Employees	45
Obtaining Information on Registered Sex Offenders in the Area of the School	45

SECTION X – Academia Medical Institute POLICIES REGARDING ILLEGAL POSSESSION, DISTRIBUTION AND USE OF ALCOHOL AND DRUGS / SUBSTANCE ABUSE	46
Substance Abuse Prevention Policy	46
Students May Notify Confidentially	46
Confronting a Student Suspected of Being Under the Influence of Drugs or Alcohol	46
Interviewing a Student Suspected of Being Under the Influence of Drugs or Alcohol	47
Student Admits to Being Under the Influence of Drugs or Alcohol	47
Transporting an Impaired Student from the Campus	47
Safety Concerns Outweigh Privacy Concerns	47
Student Denies Being Under the Influence of Drugs or Alcohol	47
Determination of Impairment – Negative	48
Determination of Impairment – Positive	48
Students with Substance Abuse Problems – Assistance with Obtaining Treatment	48
Director Shall Not Conduct Counseling	48
Director – No Legal Confidentiality	49
Director Shall Not Offer any Legal Advice	49
Drug and Alcohol Abuse Prevention Methods – Announcements	49
Drug and Alcohol Abuse Prevention Methods – Information on the Law	49
Drug and Alcohol Abuse Prevention Methods – Health Hazard and Criminal Conviction Information	49
Drug and Alcohol Dependency Treatment Counseling – Outside Services	50
Drug and Alcohol Dependency Treatment Programs at Academia Medical Institute	50
Students with Substance Abuse Problems – Attending Classes	50
Students who Fail to Provide a Clearance Letter	51
Students Withdrawn for Substance Abuse Problems – Re-Admittance	51
Academia Medical Institute Policy and Criminal Law	51
Crimes on Campus Involving Drugs or Alcohol	51
Biennial Review of Campus Drug and Alcohol Abuse Prevention Measures and Policies	51
Changes to Policy – Approval and Implementation	52
Changes to Policy – Notification and Implementation	52
SECTION XI – THE VIOLENCE AGAINST WOMEN ACT OF 1994	53
Background	53
SECTION XI – THE CLERY ACT ANNUAL SECURITY REPORT	54
Annual Report – Required	54
Distribution of the Annual Report – Academia Medical Institute Policy	54

Distribution of the Annual Report – Methods	54
Completion and Distribution of the Annual Report – Responsibilities	54
Annual Report – Retention Requirements	54
Annual Report / Crime Statistics – Submission to the U.S. Department of Education	55
Content of the Annual Report	55
Contributions to the Annual Report – Who May Contribute Information	55

SECTION I - ANNUAL SECURITY REPORT PURPOSE

Introduction

Under the Clery Act, all schools that participate in Title IV Federal Student Aid programs must compile, maintain and disclose certain information regarding crimes committed on or in the immediate vicinity of the school's campus or other property. Crime statistics gathered and recorded under the Clery Act must be submitted to the U.S. Department of Education annually, on October 1st. These crime statistics must also be made available to all students and prospective students of the school. The U.S. Department of Education is responsible for monitoring overall compliance with the provisions of the Clery Act. Failure by a school to comply with these provisions can result in disciplinary measures; including fines per violation discovered, as well as termination of the school's eligibility to participate in Title IV Federal Student Aid programs.

In compliance with the Department of Education regulations, Academia Medical Institute has created this report to provide an overview of the institute's security resources, policies and procedures, crime statistics, hazing information, and fire safety information.

This report is updated annually and made available to all students, employees, and applicants for admission and employment via Academia Medical Institute's website: www.amiohio.edu. Hard copies of the report are available upon request.

Academia Medical Institute is an intimate, industry-specific educational facility, and we strive to ensure that those students who attend our institution can do so feeling safe and comfortable.

Academia Medical Institute has developed a number of policies, procedures to help promote a safe and secure learning and working environment. We are determined to provide as much information to our staff and students as possible to guarantee they are equipped with the knowledge to make mature and safe decisions in order to prevent potential issues from arising both here and in their personal lives. The personal safety of all students, staff, instructors, and guests is our highest priority.

Background

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. §1092(f)) served to amend the Higher Education Act of 1965. The Clery Act was signed into law on 11/08/1990. The Clery Act is named after Ms. Jeanne Clery; a student at Pennsylvania's Lehigh University, who was murdered in 1986. This crime led to a federal investigation of crimes going unreported on American college campuses.

SECTION II – PREVENTION AND AWARENESS PROGRAMS

Security Awareness and Crime Prevention

The Institute is committed to the safety and security of the campus community. Academia Medical Institute promotes safety and security by periodically sending safety/security awareness information via email and or Remind app. In addition, Staff will attend department meetings to discuss safety/security awareness. The campus community is routinely educated about security awareness and crime prevention measures via email and or Remind App, and through the distribution of flyers and pamphlets.

Safety and Security is the responsibility of everyone. Academia Medical Institute encourages students and employees to be responsible for their own security and the security of others. Awareness and timely reporting of criminal or suspicious activity is crucial to maintaining a safe and secure campus.

Prevention and Awareness Programs

The school provides primary prevention and awareness programs for all incoming students and new employees that address topics, including definitions, risk reduction, bystander intervention, reporting and investigation procedures, and sanctions as described within this document. The school will also provide ongoing prevention and awareness campaigns for students and employees that include this same information.

Various programs are designed to inform students and associates about campus security procedures and practices and to encourage students and associates to be responsible for their own and others' security. Campus security concerns are addressed in weekly informal lunch meetings with staff. All students, staff and faculty are provided a copy of this Annual Security Report. Special security bulletins will be distributed, if a need arises, to advise students or associates of community crime patterns and suspect information. Staff are provided with security orientation information during their initial employment evaluation period.

Specifically, these programs:

- Identify that the school prohibits any forms of conduct that can be identified as domestic violence, dating violence, sexual assault and stalking;
- Define dating violence, domestic violence, sexual assault and stalking as those terms are defined for the purposes of Clery Act reporting; and define what behavior and actions constitute consent to sexual activity in the local jurisdiction.
- The prevention and awareness campaigns are also designed to promote risk reduction and safe options for bystander intervention as described below.

Reducing Risk

General crime prevention strategies can help reduce the risk of falling victim to sexual related crimes . In addition, recognizing the warning signs of abusive behavior can serve as a deterrent to sexual related crimes. The following is an example of behaviors seen in people who abuse their partners. If someone exhibits more than three of these warning signs, there is a strong potential for abuse in the relationship.

An abuser may exhibit only a few of these behaviors, but they may be quite exaggerated.

- Past abuse
- Threats of violence or abuse
- Breaking objects
- Use of force during an argument
- Jealousy
- Controlling behavior
- Quick involvement
- Unrealistic expectations
- Isolation
- Blames others for problems
- Blames others for their feelings
- Hypersensitivity
- Cruelty to animals or children
- Jekyll-and-Hyde personality

Bystander Intervention

An engaged bystander is someone who intervenes in a safe and positive way before, during, or after a situation or event in which they see or hear behaviors that promote dating violence, domestic violence, sexual assault, or stalking. The bystander approach attempts to teach community members how to be engaged bystanders in a safe and effective way. Primary prevention activities take place before violence happens to prevent perpetration or victimization.

If you see someone in danger of being assaulted:

- Call 911.
- Before stepping in, make sure to evaluate the risk so as to not put yourself in danger.
- Unless you fear you are in danger, don't leave. If you remain at the scene and are a witness, the perpetrator is less likely to do anything.
- If you know the perpetrator, tell the person you do not approve of his/her actions. Ask the person to leave the potential victim alone.

Crime Definitions

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.)

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.

Burglary (B&E): The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the

aforementioned.

Consent: Clear, knowing, and voluntary agreement to engage in specific sexual activity. Consent cannot be given by a person who is incapacitated by alcohol or drugs, asleep, unconscious, or otherwise unable to understand the nature of the activity. Silence or lack of resistance is not consent. Consent to one act does not imply consent to another, past consent does not imply future consent, and consent may be withdrawn at any time. Consent cannot be obtained by force, threat, or coercion.

Criminal Homicide: Murder and Non-negligent Manslaughter: The willful (non-negligent) killing of one human being by another.

Criminal Homicide: Negligent Manslaughter: The killing of another person through gross negligence.

Dating Violence: Ohio law does not define "dating violence" as a separate criminal offense. Acts of dating violence may be prosecuted under other Ohio offenses of violence, such as assault (ORC 2903.13) or menacing by stalking (ORC 2903.211). Ohio law allows a person who is or was in a dating relationship with the respondent to seek a civil protection order (ORC 3113.31). For purposes of this policy, Academia Medical Institute uses the Clery Act definition of dating violence stated above.

Destruction/Damage/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.

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.

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.

Hate Crimes: A hate crime is defined as any crime that manifests evidence that a victim was selected because of his/her actual or perceived race; gender; gender identity; religion; sexual orientation; ethnicity; national origin or disability.

Hazing (Clery Act definition, 20 U.S.C. 1092(f), as amended by the Stop Campus Hazing Act): Any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons, regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in a student organization; and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution or the organization, of physical or psychological injury, including whipping, beating, striking, electronic shocking, placing a harmful substance on someone's body, or similar activity; causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or similar

activity; causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances; causing, coercing, or otherwise inducing another person to perform sexual acts; any activity that places another person in reasonable fear of bodily harm through threatening words or conduct; any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Hazing (Ohio, ORC 2903.31): Doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization, or any act to continue or reinstate membership in or affiliation with any student or other organization, that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse.

Illegal 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.

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

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.

Larceny-Theft (Except Motor Vehicle Theft): The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

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.

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.)

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.

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.

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

- Consent as the voluntary agreement of the complainant to engage in the sexual activity in question. Conduct short of a voluntary agreement to engage in sexual activity does not

constitute consent as a matter of law.

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.

Domestic Violence: No person shall knowingly cause or attempt to cause physical harm to a family or household member; recklessly cause serious physical harm to a family or household member; or, by threat of force, knowingly cause a family or household member to believe that the offender will cause imminent physical harm to the family or household member. "Family or household member" is defined in ORC 2919.25(F).

Sexual Assault: Ohio law does not define "sexual assault" as a single offense. Sexual offenses are defined in ORC Chapter 2907 and include rape (ORC 2907.02), sexual battery (ORC 2907.03), unlawful sexual conduct with a minor (ORC 2907.04), gross sexual imposition (ORC 2907.05), and sexual imposition (ORC 2907.06). For purposes of this policy, Academia Medical Institute uses the Clery Act definitions of rape, fondling, incest, and statutory rape stated above.

Stalking: No person, by engaging in a pattern of conduct, shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person, or cause mental distress to the other person or a family or household member of the other person.

Crime Statistics for Academia Medical Institute

	Campus			Housing			Public Property		
CRIME CATEGORIES	2023	2024	2025	2023	2024	2025	2023	2024	2025
PRIMARY CRIMES									
Criminal Homicide:									
Murder & Non-negligent manslaughter	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0
Sex Offenses:									
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Hazing	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0

Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Destruction, damage or vandalism to property	0	0	0	0	0	0	0	0	0
Any other crime involving bodily injury	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
HATE CRIMES									0
Hate Crimes Related to Any of the Above Crimes Based On:									
Race, Gender, and Religion	0	0	0	0	0	0	0	0	0
Sexual Orientation	0	0	0	0	0	0	0	0	0
Ethnicity	0	0	0	0	0	0	0	0	0
Disability	0	0	0	0	0	0	0	0	0
ARRESTS AND REFERRALS									
Liquor/Drug/Illegal Weapons Violations: Arrests for liquor violations, drug law violations, and illegal weapons possession	0	0	0	0	0	0	0	1	0
Persons not included above who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possessions	0	0	0	0	0	0	0	0	0
VAWA CRIMES									
Domestic Violence	0*	0*	0*	0*	0*	0*	0*	0*	0*
Dating Violence	0*	0*	0*	0*	0*	0*	0*	0*	0*
Stalking	0*	0*	0*	0*	0*	0*	0*	0*	0*

	Campus			(2) Housing			Public Property		
FIRE STATISTICS	2023	2024	2025	2023	2024	2025	2023	2024	2025
Number of Fires	0	0	0	0	0	0	0	0	0
Number of persons who suffered fire-related injuries and received medical facility treatment	0	0	0	0	0	0	0	0	0
Number of deaths related to fire	0	0	0	0	0	0	0	0	0

Value of property damage caused by fire	0	0	0	0	0	0	0	0	0
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NOTE: Academia Medical Institute does not provide on-campus housing; therefore, no on-campus student housing facility statistics are reported.

***Academia Medical Institute has a good faith obligation to comply with changes made by VAWA prior to issuance of the final rule.**

SECTION III – BASIC PROVISIONS AND COMPLIANCE REQUIREMENTS

Basic Provisions of the Clery Act

Under the Clery Act, any school that participates in Title IV Federal Student Aid programs must do the following:

- Collect, compile, classify and record all incidents of crimes that are covered by the Clery Statistics that take place on school grounds, or on property deemed by the Clery Act to be part of the school's "Campus Geography."
- Provide timely warnings ("Campus Alerts") to all students and employees of all incidents and/or situations that represent (or may represent) a threat to their safety.
- Issue "Emergency Notifications" upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to students and employees.
- Publish an annual Campus Security Report. The Campus Security Report shall contain safety and security-related policy statements and crime statistics and shall be distributed to all current students and employees of the school.
- Inform all prospective students and prospective employees of the existence and availability of this report.
- Maintain all crime statistics compiled under the Clery Act on campus for at least eight (8) years.
- Implement and disclose all emergency evacuation and notification procedures for the school.
- Implement a Program Participation Agreement (PPA) requirement concerning the disclosure of the results of any institutional disciplinary proceedings to the alleged victim of any crime of violence, or a non-forcible sex offense.
- Collect and disclose statistics on reported hazing incidents, maintain a written hazing policy and prevention program, and publish a Campus Hazing Transparency Report.

Specific Requirements that Do Not Apply to Academia Medical Institute

Some Clery Act requirements depend on characteristics that Academia Medical Institute does not have. Because Academia Medical Institute does not maintain a campus police or campus security department, it is not required to maintain a daily crime log (34 CFR 668.46(f)). Because Academia Medical Institute does not provide on-campus student housing, it is not required to publish fire statistics or maintain a fire log (34 CFR 668.49), or to adopt missing student notification procedures (34 CFR 668.46(h)).

Security Awareness and Crime Prevention Strategies

We all must work together to maintain a safe and secure environment. Heighten your security awareness and remain vigilant. Know your surroundings and who or what should or should not be there. If you have a concern or see something suspicious, report it immediately to security or law enforcement.

Be cautious and suspicious of:

- Any odd or out of the ordinary occurrences
- Suspicious behavior
- Strange or peculiar activity
- Unattended backpacks, briefcases, etc.
- Packages, envelopes that do not appear normal
- Strange or illegally parked vehicles

If you encounter a suspicious situation or person:

DO:

- Be observant and attentive
- Remember details
- Act noncommittal/ask for time

DO NOT:

- Investigate on your own
- Commit yourself to anything

You can minimize your chances of becoming a victim of crime if you know what situations to avoid and what preventive actions to take. Common-sense prevention skills can help make life at work safer for all.

- Trust your instincts. They are a natural gift that tells you when something is wrong.
- Be ready to take protective action if necessary. This could be something as simple as crossing the street and entering a populated area.
- Never leave valuables unattended and unsecured.
- Before you exit your car or building, check your surroundings for suspicious looking people and vehicles.
- Walk confidently and briskly.
- Scan the area around your car as you approach. If you see someone loitering around your vehicle, walk past until they leave.
- Always lock your office and any unoccupied room, even when leaving for only a moment.
- Check the identity of any strangers who are in your work area office - offer your assistance and ask them whom they are visiting and if you can help them find that person. If they make you uncomfortable, report your suspicions.
- Always let someone know where you'll be - whether you're coming in late, working late, going to lunch, or to a meeting.
- Be discreet - don't advertise your social life and vacation plans or those of others to people visiting or calling.
- Be cautious in restrooms. Attackers can hide in stalls and corners.
- Leaving late - create a buddy system for walking to the parking lot/garage.

Safe Social Networking:

- Be cautious when accepting friend requests and interacting with people online.
- Don't share information that you don't want to become public.
- Providing too much information in your profile can leave you exposed to people who want to steal your identity or steal sensitive information.
- When using Facebook and other social media platforms, do not post personally identifiable

information.

- Take a close look at all privacy settings. Set security options to allow visibility to “friends only.”
- Geotagging is a feature that reveals your location to other people within your network. Consider turning off the GPS function of your smartphone.

Academia Medical Institute Emergency Procedures

In the case of emergencies, action will be taken immediately in accordance with the policies outlined in this manual.

I. INFORMATION TO DISCLOSE (TO 911 AND/OR DIRECTOR)

Academia Medical Institute address: 4079 Executive Parkway, Westerville, Ohio 43081

Exact location on campus where occurring: In the Skills Lab of Academia Medical Institute in the Great Western Shopping Center

Nature of emergency (i.e. fire, medical, weapon): We have fire emergency

How many people injured and extent of injuries: There are no Injuries and everyone has evacuated

How did it happen: The fire started at the skills lab near an outlet.

When did it happen: The students in class reported smelling smoke approximately 15 minutes ago

Your name and contact information: My name is Jane Doe and my number is 555-555-5555.

Do not hang up with the dispatcher, or leave premises, until instructed to do so.

II. IMPLEMENT EMERGENCY PROCEDURE INDICATED BY DIRECTOR

Evacuation

Lockdown

All Clear

III. EVACUATION PROCEDURE

All students are made aware of the two exits during mandatory Orientation prior to beginning their program. All employees have been trained concerning evacuation plans and will promptly escort all occupants out of the building via the nearest exit.

Once clear of the building, occupants go to the designated holding area and wait until the Director has conducted a head count. Each staff/faculty member is responsible for reporting to the Director an accurate head count of the visitors/students for which they are responsible. They must also note any students who were absent.

The designated holding area is in the west parking lot furthest away from the building. No one is to re-enter the building for any reason until the Fire Department, or other responsible agency, has indicated that the building is safe for re-entry and the Director has issued the ALL CLEAR.

IV. LOCKDOWN PROCEDURE

Lockdown procedures vary depending on the severity of the situation.

A basic lockdown involves the instructor ensuring all students remain in the classroom until the ALL CLEAR is given.

A more serious situation would require the instructor to lock all doors to their classroom, move the students to the safest area within, do a headcount, turn out the lights, and then notify the Director via cellphone if any students are missing and the current status.

****Regardless the severity of the situation, the instructor will inform the students that an emergency situation has occurred and everyone must remain calm and quiet in the classroom until further notice.**

****No one is to leave their area until the ALL CLEAR has been given by the Director.**

If life-threatening, call 911, Notify the Director and Complete Incident Report

INCIDENT SPECIFIC PROCEDURES

I. FIRE

If you start or notice the fire

- Clearly announce there is a fire and where it is located: "FIRE! There in the skills lab.
- Do NOT attempt to fight the fire.
- Use fire extinguisher for personal safety only
- Exit through nearest exit
- Notify the Director that you announced the fire and the location and cause (if known) of the fire
- If you are responding to fire announcement
- Evacuate the building and report to holding area
- The last person leaving an area in the building should close the door behind them

Any fire that is quickly extinguished must still be reported to the Director for documentation and a thorough safety inspection conducted.

II. POWER FAILURE

- Faculty will be issued flashlights or asked to exit the building. Class may be moved to a different location within campus.
- Remain in classroom calmly and quietly until the Director notifies you of the procedure

III. MEDICAL EMERGENCY/FIRST AID

- **If life-threatening** - contact 911 first, then the Director (send message though remind to students and staff if necessary)
- Stay at location of emergency until rescue team arrives
- Initiate CPR/Basic First Aid, if necessary and qualified, exercising extreme caution
- Do NOT allow a student to administer medical attention to another student
- Evacuate area - the Director or Staff will escort students to holding area

IV. VIOLENT OR CRIMINAL INCIDENT

- If incident poses danger of death or bodily injury, contact 911 first, then the Director
- Report any suspicious behavior promptly to the Director
- Indicate nature of incident, location, description of persons involved, description of property involved, type of weapon, if any, and so on
- Do NOT put yourself in harm's way. Remove other innocent bystanders from altercation if

possible.

V. PSYCHOLOGICAL INCIDENT

Pertains to situations when individual is threatening to harm themselves or others, suicidal behavior, etc. Also includes situations when individual is not acting in a rational manner, i.e. hallucinating, unable to effectively communicate with others, etc.

- Do NOT try to handle the situation on your own
- If life-threatening - contact 911 first, then the Director
- Evacuate area – the Director or Staff will escort students to holding area

VI. WEAPONS AND FIREARMS

*Per institute policy, no person shall possess or have any firearm, deadly weapon, or prohibited knife while present on any property owned or operated by Academia Medical Institute

- Do NOT approach person with weapon
- Evacuate the area, if safe to do so, notifying others as you leave and direct them to appropriate holding area
- Contact 911 first, then the Director
- Remain out of area and take steps to prevent others from entering area
- Remain calm and quiet
- Do NOT attempt to rescue others unless trained, or can reach them safely

VII. BOMB THREAT

If you receive the call directly, encourage caller to talk 1. When is it going to detonate? Where is it located? What type is it? What does it look like? Why did you place it? Keep them talking as long as possible and record as much of the following as you can:

- Time of call
- Approximate age and gender of caller
- Speech pattern, accent, or other distinguishing traits
- Emotional state of caller
- Background noises

After caller hangs up, do NOT hang up your phone, use another to make any additional calls

- Contact 911 first, then the Director
- Do not handle a suspicious object

VIII. TORNADO

- Stay inside away from windows and outside walls, mirrors, glass, overhead fixtures, and unsecured objects.
- Both Stairwells are designated tornado shelter areas.

IX. HURRICANE/SEVERE WEATHER

The Director will monitor development of hurricanes and advise on likelihood that storm and winds will impact campus

- If the decision is made that the institute should be closed, a mass email/text and or remind

message will be sent to inform students and faculty. A voicemail will be left on the phone system voicemail so students are able to call in for information regarding the status of their class.

- If the decision is made to close after staff, faculty, and students have already arrived, the following procedure will take place:
 - Students and non-essential personnel should depart as soon as possible
 - Remaining staff members will begin securing the building and critical data by unplugging all electronics, moving unsecured objects inside building to prevent debris damage from winds, etc.
 - After a storm, authorized personnel will conduct damage assessment and debris removal during first daylight hours following storm. Should the facility be in acceptable condition, classes will be reinstated and an email, voice/ remind or text message will be sent. Faculty and staff will be notified via mass email, text and remind message.

X. ALL CLEAR

Once a situation has been neutralized, the Director only must signal the ALL CLEAR. If the Director is not present, the next highest ranking employee will be responsible for filling the Director's responsibilities.

CONTINUITY OF OPERATIONS IN THE EVENT OF AN EMERGENCY

After an emergency, authorized personnel will conduct a damage assessment as soon as safely possible following the event. Should the facility be in acceptable condition, operations will be reinstated immediately. Should the facility *not* be in acceptable condition, authorized personnel will attempt to make alternate arrangements to resume operations, or make the determination to either postpone or cancel continuation of operations.

POLICIES

EMERGENCY PROCEDURES REVIEW

Academia Medical Institute policy states that the information contained in this document shall be made available to all new employees when issued their Employee Handbook, and to all current employees annually in January. New students are given the link to access this document online during their Orientation session. Prospective students may access this document as well via the institute website. A hard copy of this document is also posted on the student bulletin board. Furthermore, every December, the Director will review this Security and Fire Safety Report, make any improvements necessary and update the report as needed. The Director is responsible for compiling the annual Crime Brief, viewable on the institute website no later than October 1st.

SECTION IV – CAMPUS GEOGRAPHY AND REQUIREMENTS OF THE CLERY ACT

Compliance Requirements - Timeframes

Compliance with the requirements of the Clery Act is not accomplished by once-per-year reporting. Full compliance is an ongoing process. While the required submission of statistics to the U.S. Department of Education takes place once per year, reporting, recording and maintaining records of crimes, fires, and of other emergency situations must be done continuously. The following table establishes timeframes for required compliance with the various provisions of the Clery Act.

Clery Act

Clery Act Requirement	Timeframe for Compliance
Have procedures for Emergency Notifications and Evacuation of the school's campus.	The campus is notified of all emergencies through an email notification system. Campus has the ability to send mass text messages and emails to students during times of emergency
Issuance of Timely Warnings.	Issue a Timely Warning in all cases of a threat that crime is ongoing and may be repeated.
Request Crime Statistics from local Law Enforcement agencies.	Request these statistics annually; preferably At the beginning of the calendar year.
Submit crime and fire statistics to the U.S. Department of Education via the Department's web-based collection facility.	Submit these statistics by or on October 1 st of the year.
Publish an Annual Security Report	The Annual Security Report shall be completed and published by October 1 st . The Report shall be made available to all current students and employees.

Regulatory Audits and Penalties for Non-Compliance

The U.S. Department of Education conducts periodic audits of school compliance with the Clery Act, and investigates all allegations of non-compliance thoroughly. Any school found not to be in compliance with the provisions of the Clery Act shall receive the results, conclusions and penalties for non-compliance in a Final Review Determination Report. This Report is a public record; accessible to anyone. All schools with

sustained violations are listed on the U.S. Department of Education's website: <https://fsapartners.ed.gov/home/>.

Federal law also affords whistleblower protection to individuals who report violations and/or non-compliance to the U.S. Department of Education.

Only those crimes and/or emergency incidents that occur within the boundaries of the school's "On-Campus Geography" and "Public Property Geography" must be recorded and reported under the Clery Act. The terms "On-Campus Geography" and "Public Property Geography" are critical to this requirement, and they have specific meanings according to U.S. Department of Education guidelines. It is the responsibility of the school to know and to keep track of all buildings, facilities, common areas and public properties that fall within that school's Clery Act reporting geography.

"On-Campus Geography" and "Public Property Geography" – Defined

Under U.S. Department of Education guidelines, a school's "On-Campus Geography" includes both "On-Campus Geography" and "Public Property Geography." Crime statistics and incidents must be compiled and reported for all areas falling within these geographical boundaries. It is essential that employees of Academia Medical Institute know and understand these geographical regions, so that accurate and timely reporting of incidents can be facilitated.

"On-Campus Geography" is defined as follows:

Any building or property owned or controlled by an institution (school) within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, and any building or property that is within or reasonably contiguous to those areas described above, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes.

"Public Property Geography" is defined as follows:

All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Geographical Areas for Academia Medical Institute

Under this definition, Academia Medical Institute's "On-Campus Geography" and "Public Property Geography" covers Academia Medical Institute's Main Campus located at 4079 Executive Parkway, Westerville, OH 43081.

Academia Medical Institute Campus

All rooms, hallways and areas of the main campus to include parking lot located at 4079 Executive Parkway, Westerville, OH 43081.

Common Areas/Public Property Geography

The sidewalk on the north side 4079 Executive Parkway, Westerville, OH 43081.

The street surfaces immediately adjacent to and accessible from Academia Medical Institute.

Non-Campus Buildings or Property

N/A - Academia Medical Institute does not officially recognize any student organizations with non-campus locations, including non-campus housing facilities.

Clery Act Requirements for Special Events Sites – Reporting Not Required

Unless Academia Medical Institute enters into a contract with the owner(s) of a site used for special events, and unless that contract gives Academia Medical Institute control of the physical space used for the duration of the event, then information regarding incidents of crimes or threats to health and/or safety is not required for these sites.

SECTION V – CRIME STATISTICS AND CRIME CLASSIFICATIONS FOR CLERY ACT REPORTING

Not all crimes must be reported or statistically collated for purposes of the Clery Act. Crimes that are not required to be reported under the Clery Act are not listed on the posted crime statistics. It is important for employees of Academia Medical Institute that assist in preparing the annual report to know these categories, classifications and exemptions.

Policy for Reporting Crimes and Incidents Not Covered by the Clery Act

Although many crimes are not covered by Clery Act reporting and recording requirements, it is the policy of Academia Medical Institute to report and record all incidents of crime that take place on school grounds, or in the common areas adjacent to those grounds. All employees and students of Academia Medical Institute are required to report incidents of crime or threats to the health and/or safety of persons on school grounds immediately. The following procedures detail the responsibilities of students and employees for initial reporting of any incident of crime or threat to health and/or safety that occurs within the school's geographical area of responsibility.

Reporting Procedures – Students

In the event that a student of Academia Medical Institute is the victim of a crime, person or persons at Academia Medical Institute, the student should immediately report to the Director.

This can be accomplished in any way that the student sees fit to do so: in person, by email, by telephone, by text message, etc. However, if need be, a student may report an incident of crime or threat to health and/or safety to any employee of Academia Medical Institute. It is essential that any such incidents of crime or threats to health and/or safety be reported immediately. This policy shall not be construed to interfere with the prompt and efficient reporting of any incident of crime or threat to the health and/or

safety of students, employees and visitors to the school.

Students may also report any crime directly to the local law enforcement agency or call 911 in the event of an emergency. Additional Emergency Contact information for the Academia Medical Institute is as follows:

FIRE: 5151 Little Turtle Way, Westerville, OH 43081

POLICE: 6340 S Hempstead Road, Westerville, OH 43081

AMBULANCE: Dial 911

Institute Name & Address: Academia Medical Institute - 4079 Executive Parkway, Westerville, OH 43081

A victim or witness who does not want to pursue action through Academia Medical Institute or the criminal justice system may still report a crime on a voluntary, confidential basis for inclusion in the annual crime statistics. Confidential reports may be made to the Director, who will record the type, date, and general location of the crime without recording the name or other identifying information of the victim or witness.

Reporting Procedures – Employees

Any employee of Academia Medical Institute who becomes aware of, or is made aware of, a crime or threat to health and/or safety of anyone at Academia Medical Institute shall report the incident to the Director immediately. This can be accomplished in any way that the employee sees fit to do so: in person, by email, by telephone, by text message, etc. The Director shall instruct the employee regarding what (if any) actions the employee is to take. The Director shall, if necessary or warranted, contact law enforcement and inform them of the situation. In the event that an employee cannot contact the Director to report an incident, the employee shall contact the most senior member of the school's administration and report the incident. The senior member of the school's administration shall assume the responsibility for notifying law enforcement, and for notifying the Director.

Protecting the Confidentiality of Crime Victims

It is the policy of Academia Medical Institute that the privacy and confidentiality of any victim of any crime committed on campus, or within the school's geographic boundaries, shall be protected from disclosure to the fullest extent of the law. No person who reports a crime to school personnel, or to any law enforcement agency, shall have their name(s) and/or personal information released. No personal or identifying information regarding the victim of any crime shall be released under any circumstances, except to law enforcement and/or fire & rescue personnel as required by law. Any student who violates this policy shall be withdrawn immediately and shall not be allowed to return or re-enroll at any time. Any employee who violates this policy shall be subject to disciplinary action; up to and including termination of employment with Academia Medical Institute.

Classifications of Reportable Crimes under the Clery Act

The Clery Act requires schools to compile statistical information, and report incidents of, any crimes that fall under the below categories:

- **Offenses:** Murder and Non-Negligent Manslaughter, Negligent Manslaughter, robbery, aggravated assault, burglary, motor vehicle theft, arson.

- **Sex Offenses Forcible:** Rape, fondling
- **Sex Offenses, non-forcible:** incest, statutory rape
- **VAWA Offenses:** Dating violence, domestic violence, stalking
- **Arrests and Referrals for Disciplinary Action:** Alcohol, drugs, illegal weapons
- **Hate Crimes:** Larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property when motivated by bias
- **Hazing:** incidents reported to campus authorities or local police

Determining Whether a Criminal Incident is Reportable under the Clery Act

For purposes of complying with the Clery Act, the various reportable criminal incidents, and their classifications, are addressed in detail in 34 CFR 668.46 and Appendix A to Subpart D of 34 CFR Part 668, and in the United States Department of Education's Clery Act Appendix for FSA Handbook. It shall be the responsibility of the Director to review all incidents of crime (or suspected crime) reported to the school and to determine which, if any, of the categories are applicable to the incident.

Note: For purposes of the Clery Act, schools are required to report any incidents of crime that fall within the reportable categories, of which the school is aware. *This is important.* Just because the victim of the crime, or the person reporting the crime to employees of Academia Medical Institute, does not report the crime to the police, it does not mean that the school is not required to include it in their annual report of crime statistics, or to take any action(s) required by law. If the school is made aware of a reportable incident, then the school must include that incident in its annual report, and school personnel must act in accordance with local, state and federal laws. The fact that no police report was made is irrelevant. In addition, the fact that a reported incident of crime does not result in an official police investigation, arrest or prosecution is irrelevant. The incident must be included in the school's annual statistics and report.

Revising Reports – False/Unfounded Crime Reports

In the event that a crime is reported to the U.S. Department of Education under the Clery Act, and it is later determined to have been “unfounded” by a sworn or commissioned law enforcement officer, and a sworn or commissioned law enforcement officer informs the school of this fact, then the school shall revise the earlier statistics and remove that “unfounded” crime from the reporting statistics. Only sworn or commissioned law enforcement personnel may unfound a crime report. Academia Medical Institute discloses in this report the number of crime reports that were unfounded and withheld from its statistics in each of the three most recent calendar years (34 CFR 668.46(c)(2)(iii)).

How to Classify Specific Crimes for Clery Act Reporting

Beyond the categories of reportable crimes previously addressed, there are specific procedures for classifying individual crimes reported under the Clery Act. The source for these classifications is the Federal Bureau of Investigation's (the F.B.I.'s) *Uniform Crime Reporting* classification codes.

- **Criminal Offenses:** When reporting and classifying criminal offenses, schools are required to use the F.B.I.'s *Uniform Crime Reporting* classifications when submitting official crime statistics to the U.S. Department of Education. These classifications can be found in the F.B.I.'s *Uniform Crime Reporting Handbook*.⁹
- **Sex Offenses:** When reporting and classifying sex offenses, schools are required to use the definitions contained in the F.B.I.'s National Incident-Based Reporting System (NIBRS) of the

Bureau's *Uniform Crime Reporting Handbook*.

- *Hate Crimes*: When reporting and classifying hate crimes, schools are required to use the F.B.I.'s *Uniform Crime Reporting /Hate Crime Reporting Data Collection Guidelines*. These guidelines are found in the F.B.I.'s *Uniform Crime Reporting /Hate Crime Reporting Data Collection Guidelines and Training for Hate Crimes Data Collection Handbooks*.¹⁰
- *Arrests and Referrals for Disciplinary Action*: The classifications for an "arrest" and for a "referral for disciplinary action" under the Clery Act are found in the definitions at 34 CFR 668.46(a) and Appendix A to Subpart D of 34 CFR Part 668. Include all incidents involving an "arrest" as defined in those regulations.

***Note:** For purposes of recording and reporting incidents under the Clery Act, "Arrest and Referral" incidents are handled somewhat differently than are "Criminal Offenses" and "Hate Crimes." The following two (2) rules must be followed when reporting "Arrest and Referral" incidents in the annual report:

In the event that a student or employee is both arrested and referred for internal disciplinary action, report only the arrest in the school's annual report.

- In the event that a student or employee is referred for internal disciplinary action for any action that is not also a violation of the law, do not include this incident in the school's annual report.

Investigation Procedures

Academia Medical Institute thoroughly and promptly investigates all claims of discrimination and harassment. Academia Medical Institute will meet with the complaining staff member or student to discuss the results of the investigation and, where appropriate, review the proposed resolution. If an investigation confirms that discrimination or harassment has occurred, Academia Medical Institute will take corrective action, including such discipline up to and including immediate termination of employment or enrollment, as is appropriate.

Claims of assault or the threat of assault, if proven, will result in dismissal. Complaints of discrimination and harassment will be kept as confidential as possible. No staff member or student will be subjected to retaliation by Academia Medical Institute because he or she has reported what he or she reasonably believes to be an incident of discrimination or harassment. If a staff member or student believes he or she is being harassed or retaliated against for having made a good faith complaint of discrimination or harassment, the staff member or student must report such retaliation to Academia Medical Institute by immediately contacting the Director so that the complaint may be investigated and dealt with in an appropriate manner. Academia Medical Institute's commitment to No Discrimination or Harassment Policy If a student feels that Academia Medical Institute has not met its obligations under the policy, he or she should contact Human Resources at Academia Medical Institute.

The school has investigation procedures in place to address allegations of dating violence, domestic violence, sexual assault, or stalking. Under these procedures, when a student or employee reports to the institution that they have been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, the institution will provide a written explanation of the student's or employee's rights and options. The School is committed to undertaking prompt, thorough, impartial and fair investigations, and to treating all individuals with respect and sensitivity. Depending

upon the nature of the alleged or suspected policy violation, the relevant official (or his or her designee) will investigate either alone or with one or more other school officials as deemed appropriate by the school. The nature and extent of the investigation will vary depending upon the circumstances, including whether the parties are amenable to pursuing an informal resolution (and the matter is eligible for informal resolution, as discussed below). As part of the investigation, the relevant official (or his or her designee) will seek to interview the complainant and the accused. To help ensure a prompt and thorough investigation, complainants are asked to provide as much information as possible:

- The name, department, and position of the person or persons allegedly causing the dating violence, domestic violence, sexual assault, or stalking.
- A description of any relevant incident(s), including the date(s), location(s), and the presence of any witnesses.
- The alleged effect of the incident(s) on the complainant's opportunity to benefit from the school's programs or activities.
- The names of other individuals who might have been subject to the same or similar acts of dating violence, domestic violence, sexual assault, or stalking.

Although it is not required, any steps the complainant has taken to try to stop the dating violence, domestic violence, sexual assault, or stalking.

Any other information the complainant believes to be relevant to the alleged dating violence, domestic violence, sexual assault, or stalking.

Any accused parties are also expected to provide as much information as possible in connection with the investigation.

The school reserves the right to suspend any member of the school community suspected or accused of violating this policy or to take any other interim measures the school deems appropriate, pending the outcome of an investigation or grievance. Such interim measures can include, but are not limited to, modifying course schedules, and issuing a "no contact" order.

In situations involving suspected or alleged violations of this policy the School also reserves the right to take steps to protect the complainant as deemed necessary during the pendency of the investigation and resolution process (e.g., allowing for a change in academic situation, issuing a "no contact" order to the accused, or other measures as appropriate). Any such interim steps will be taken in a manner that minimizes the burden on the complainant to the extent possible. Interim measures will be kept confidential to the extent that maintaining such confidentiality would not impair the ability of the school to provide the interim measures.

Informal Resolution Process

Allegations of sexual assault, dating violence, domestic violence or stalking may not be resolved using an informal resolution process (i.e., mediation). However, other alleged violations of this policy, including some allegations of sexual harassment, may be resolved using an informal resolution process overseen by one or more school representatives if (a) the school determines, in its discretion, that such a process would be appropriate; and (b) all parties agree to participate. The parties to any such informal process will not be required to deal directly with one another without the School's involvement. Instead, one or more school representatives may arrange for or facilitate mediation between the involved parties and

coordinate other informal resolution measures. Any party may request that the informal resolution process be terminated at any time, in which case the formal resolution process (described below) would commence. In addition, any party can pursue formal resolution if he or she is dissatisfied with a proposed informal resolution.

Formal Resolution Process

The formal resolution process applies (a) when any party so requests in connection with a matter that is eligible for informal resolution; and (b) to all matters that are not eligible for informal resolution (i.e., matters involving alleged or suspected sexual assault, dating violence, domestic violence or stalking). The school may also elect to use the formal resolution process in any matter when the school deems it appropriate. As part of the formal resolution process, the school may determine that further steps are required to complete the school's investigation. The following procedural protections apply to matters that are not resolved using the Informal Resolution Process described above:

Investigator Qualifications

The official(s) designated to conduct the investigation shall be trained in the investigation of, and other issues related to, sexual assault, domestic violence, dating violence, stalking and other misconduct covered by this policy, shall not have a conflict of interest or bias for or against any parties involved in the potential policy violation, and shall have received at least annual training on issues related to these issues.

Standard for Determining Responsibility. The standard used to determine whether this policy has been violated is whether it is more likely than not that the accused violated this policy. This is often referred to as a "preponderance of the evidence" standard.

Rights of Complainants and Accused Parties; Timing of Resolution. The school shall provide any individual suspected or accused of violating this policy with a written explanation of the suspected or alleged violations of this policy. Complainants and accused parties shall both be provided with the following in connection with the resolution of suspected or alleged violations of this policy:

- The opportunity to speak on their own behalf.
- The opportunity to identify witnesses who can provide information about the alleged conduct at issue.
- The opportunity to submit other evidence on their behalf.
- The opportunity to be accompanied to any meeting or proceeding related to the school's resolution of an alleged or suspected violation of this policy by an advisor of their choice.
- The school will not limit the choice of advisor or presence for either the complainant or accused, but advisors are prohibited from speaking on behalf of either the complainant or accused and may be removed or dismissed from the meeting or proceeding if they become disruptive or do not abide by this restriction on their participation.
- The opportunity to review any information that will be offered by the other party in support of the other party's position (to the greatest extent possible and consistent with FERPA or other applicable law) as well as timely and equal access to any other information that will be used during any informal or formal disciplinary proceedings.
- The right to be informed of the outcome of the investigation (to the greatest extent possible and consistent with FERPA or other applicable law).
- The opportunity to appeal the outcome of the investigation.

Anticipated Timelines. Academia Medical Institute will make reasonable efforts to complete the investigation and determination within [sixty (60)] calendar days after receiving a complaint. Timeframes may be extended for good cause, such as the absence of a party or witness or a request from law enforcement, with written notice to both the complainant and the accused of the delay and the reason for it. Academia Medical Institute's process is separate from any criminal proceeding and will not be postponed until a criminal investigation or trial is complete.

Title IX Grievance Process. When an allegation also meets the definition of sexual harassment under Title IX (34 CFR Part 106), Academia Medical Institute will follow its Title IX Grievance Procedure, which includes a live hearing at which each party's advisor may ask the other party and any witnesses relevant questions, including questions challenging credibility. Questioning is conducted by advisors, not by the parties personally. If a party does not have an advisor at the hearing, Academia Medical Institute will provide one without fee for that purpose.

Sanctions: Corrective Actions

The official conducting the investigation will determine whether a violation of this policy has occurred and what, if any, corrective action is appropriate. The school will take reasonable steps to prevent the recurrence of any violations of this policy and to correct the discriminatory effects on the complainant (and others, if appropriate).

The range of potential sanctions/corrective actions that may be imposed against a student includes the following: written or verbal apology, sexual assault, dating violence, domestic violence or stalking prevention education, verbal or written warning, probation, suspension, and/or dismissal from the school. Employees who are found to have violated this policy may be terminated or subjected to other disciplinary action in accordance with the Code of Business Conduct & Ethics. Guests and other third parties who are found to have violated this policy are subject to corrective action deemed appropriate by the school, which may include removal from the school and termination of any applicable contractual or other arrangements.

In instances where the school is unable to take disciplinary or other corrective action in response to a violation of this policy because a complainant insists on confidentiality, or for some other reason, the school will nonetheless pursue other steps to limit the effects of the conduct at issue and prevent its recurrence.

Notification of Outcome

After the conclusion of the investigation, the school will provide written notification to the complainant and the accused of the outcome (i.e., whether a violation of this policy has occurred), including the rationale for the outcome and an explanation of the school's appeal procedures, within seven (7) calendar days after the conclusion of any hearing or proceeding unless the school determines that additional time is required. This notice shall be issued in writing and simultaneously to both parties to the extent practicable. Both parties will also be notified simultaneously and in writing of any change to the result and of when the result becomes final.

The school may also disclose to the complainant information about any sanctions or corrective actions taken that relate directly to the complainant (e.g., a “no contact” order). The school will maintain documentation of all hearings or other proceedings, which can take various forms (e.g., notes, written findings of fact, transcripts, or audio recordings, etc.). Under no circumstances will the complainant be required to abide by a nondisclosure agreement that would prevent disclosure of the outcome.

Right to Appeal

Once written notification of the resolution has been provided, either the complainant or the accused will have the opportunity to appeal the outcome (including the issue of whether there is a policy violation and any sanction(s) imposed). Any appeal must be submitted in writing to the Director within seven (7) calendar days of being notified of the outcome and must set forth the grounds upon which the appeal is based.

If the Director is unable to resolve the appeal for any reason, the School will designate another representative to decide the appeal. Neither party shall be entitled to a hearing in connection with any appeal, but the Director (or designee) may request written submissions from the parties or consider any other information as deemed appropriate by the Director (or designee). Both parties will be informed in writing of the outcome of any appeal within fourteen (14) days of the date by which all requested information is received unless the Director (or designee) determines that additional time is required. This notice shall be issued in writing and simultaneously to both parties to the extent practicable. Appeal decisions by the Director (or designee) are final.

Prohibition Against Retaliation

No individual who makes a complaint alleging a violation of this policy or who participates in the investigation or resolution of such a complaint shall be subject to retaliation, intimidation, coercion, threats or discriminatory action as a result of such activity or participation. Retaliation exists when action is taken against a complainant or participant in the complaint process that (a) adversely affects the individual’s opportunity to benefit from the school’s programs or activities; or (b) is motivated in whole or in part by the individual’s participation in the complaint process. Any acts of retaliation, as defined above, shall be grounds for disciplinary action, up to and including dismissal for students and termination of employment for faculty and staff.

Confidentiality

To the extent permitted by law, the confidentiality of all parties involved in the resolution of alleged or suspected violations of this policy will be observed, provided that it does not interfere with the school’s ability to conduct an investigation and take any corrective action deemed appropriate by the school. Identifying information regarding complainants will not be included in any timely warnings or other publicly available records.

Fabricated Allegations

Any allegations suspected to be fabricated for the purpose of harassing the accused party or disrupting the school’s operations are subject to these investigation and grievance procedures and could result in disciplinary action, up to and including dismissal for students and termination of employment for faculty

and staff.

SECTION VI – CAMPUS SECURITY AUTHORITIES / REPORTING DUTIES

Obtaining Information from Local Law Enforcement Agencies

While Academia Medical Institute keeps records, and is aware of, incidents of crime and situations that threaten the health and/or safety of students and employees, this does not mean that the school's records and statistics are complete. Schools are required under the Clery Act to obtain (or at least attempt to obtain) crime statistics for its geographical reporting area(s) from the local law enforcement agency, as well as from any persons or entities that the Clery Act designates as "Campus Security Authorities."

"Campus Security Authorities" under the Clery Act

The Clery Act is specific regarding who constitutes a "Campus Security Authority." Obviously, Campus Police Department personnel (if the school has a Campus Police Department) and Campus Security Guards (if the school has such guards) would fall under this classification. While Academia Medical Institute has no Campus Police Department or Security Guards, certain employees do fall under the definition of "Campus Security Authorities." The criteria for a Campus Security Authority under the Clery Act are as follows:

- Any employee of the school who has "significant responsibility for student and campus activities"
- Any employee of the school to whom students are instructed to report incidents of crime and threats to the health and/or safety of the students and employees¹²
- Any employee of the school who "is authorized to take action or to respond to particular issues on behalf of the institution."¹³

Duties of the Campus Security Authorities at Academia Medical Institute

The duties of a designated Campus Security Authority are to report to the office, entity or individual designated by the school to collect crime report information, any reports that they receive of crimes or threats to the health and/or safety of the students and employees.

It is not the responsibility or the duty of the Director to conduct investigations into allegations of crimes, seek to determine the validity of an allegation of a crime, or attempt to arrest or detain the alleged perpetrator(s) of a crime. These duties are the responsibility of the police, and the Director shall not engage in any of these actions. To do so is a violation of Academia Medical Institute policy, and may serve to hinder or even irreparably damage the legitimate criminal investigation by the police.

Duties of the Campus Security Authority Coordinator

The Campus Security Authority Coordinator is the Director. The Duties of the Campus Security Authority Coordinator are as follows:

- To receive all reports of crimes and threats to health and/or safety within the designated Campus Geography as specified for Clery Act reporting requirements.
- To maintain these reports in an organized fashion
- To ensure that all students are made aware of the existence of Academia Medical Institute's crime reporting and emergency policies and procedures
- To provide written copies of these policies and procedures as requested

- To ensure that all designated Campus Security Authorities provide a written report of any reports of crimes or threats to health and/or safety that they received during the calendar year

Security of the Academia Medical Institute Campus

Academia Medical Institute takes the security of students, prospective students, employees and visitors to the school very seriously. A number of security measures are in effect to maintain security on campus. These are:

- All students are introduced to all Academia Medical Institute staff, faculty and any outside support staff.
- Students wear a recognizable Academia Medical Institute Shirt while on campus.
- Photographs are taken when a student begins his or her program of study. These photographs are uploaded into the campus management computer system. All employees with supervisory duties have access to this system and may view any student's photograph and identifying information whenever necessary.
- Academia Medical Institute has over 16 cameras and sensor security system strategically placed throughout campus allowing management and office staff to see anyone entering or exiting the building.
- Academia Medical Institute facility maintenance is checked by the Director at least monthly. Security-related maintenance problems should be reported to the Director, who will request prompt repair from the property manager.
- The Westerville Police Department is 1.2 miles away from: 4079 Executive Parkway, Westerville, Ohio, 43081

Records and Statistics of Campus Police and/or Security Departments

Academia Medical Institute does not have a Campus Police Department; nor does it maintain a Security Department. No Academia Medical Institute employee has the authority to make arrests. Academia Medical Institute has no written memorandum of understanding with any law enforcement agency for the investigation of alleged criminal offenses. The building security is not employed by Academia Medical Institute, nor is it responsible to the school's administration. Therefore, Academia Medical Institute has no obligation under the Clery Act to obtain crime records and statistics from such agencies.

Records and Statistics of Local Law Enforcement Agencies

The Clery Act requires schools to obtain – or at least; to make a good-faith effort to obtain – relevant crime statistics from the law enforcement agency having jurisdiction over the school's campus.

Obtaining Crime Statistics Information – Responsibility

The Director shall be responsible for obtaining crime statistics records from the local law enforcement agency. This shall be done by sending an email, or contacting the Blendon Township Police Department Deputy Chief by phone. This contact should be made in a timely manner to allow for the compilation and delivery of all necessary crime statistics by the police. A copy of the email or information regarding the call should be maintained by the Director. In the event that the requested crime statistics are not provided by the police, or in the event that they are provided too late to meet the October 1st deadline as set by the Clery Act, the documentation should be evidence of a good-faith effort by the school to obtain these statistics and comply with the provisions of the Clery Act.

Refusal to Provide Crime Statistics Information

If the local law enforcement agency refuses to provide crime statistics information as requested, this fact shall be documented in the Annual Report

Scope and Content of Crime Statistics Information

The crime statistics requested of the police shall be no more than numerical statistics of crimes that occurred in the school's Campus Geography: number and type of crimes. No additional information is required under the Clery Act, and no additional information (specifics of crimes reported, names of involved persons, adjudication of criminal investigations, etc.) shall be requested.

The Director shall ensure that any crime statistics provided by law enforcement agencies pertain to the school's Campus Geography, and that all areas in which the school is required to report crime statistics are covered.

Additional specific information regarding how to request crime statistics from local law enforcement agencies is provided in the U.S. Department of Education's *Clery Act Appendix for FSA Handbook*.

SECTION VII – DAILY CRIME LOGS AND FIRE LOGS / FIRE AND RESCUE AGENCY PROCEDURES

Daily Crime Logs

According to the Clery Act, a school is required to create and maintain a Daily Crime Log only if that school has a Campus Police Department or a Campus Security Department. At this time, Academia Medical Institute has neither a Campus Police Department nor a Campus Security Department. As a result, the school is not required to create and maintain a Daily Crime Log.

Under the provisions of the Clery Act, the Building Security personnel do not constitute a Campus Security Department.

Daily Fire Logs

According to the Clery Act, only those schools with residential student housing are required to create and maintain a Daily Fire Log. Academia Medical Institute does not offer student housing, and therefore Academia Medical Institute does not use or maintain a Daily Fire Log.

Academia Medical Institute Policy Regarding Fire Records / Contact with Fire & Rescue Officials

It is the policy of Academia Medical Institute to keep a record of any instances where the fire department and/or paramedics respond to the school's campus. In the event that fire & rescue personnel respond to Academia Medical Institute's campus for any reason, the Director shall be notified immediately. Employees who interact with the fire & rescue personnel shall cooperate with their instructions fully and immediately, and shall report the details of their contact to the Director. In the event that the Director is unavailable for notification, any employee interacting with fire & rescue personnel shall notify a senior member of Academia Medical Institute administration. The Director shall be notified of the incident as soon as is possible.

SECTION VIII– EMERGENCY NOTIFICATIONS AND TIMELY WARNINGS REQUIREMENTS

Emergency situations can occur at any time. Academia Medical Institute may be affected by severe weather, including tornados, and numerous other emergency situations can threaten the health and safety of our students and employees: major accidents, structural damage caused by equipment failures such as gas leaks, major civil disturbances, etc. Academia Medical Institute has in place a system whereby it notifies students and employees of any emergency situation either by Remind, Text messaging, Facebook messenger or email in a timely way. The Clery Act sets forth two (2) notification requirements for schools: Emergency Notifications and Timely Warnings.

Emergency Situations

An Emergency Situation is any situation or state of affairs that occurs on the school's campus, which poses an immediate threat to the health and/or safety of the employees and students. Academia Medical Institute addresses Emergency Situations and contains evacuation plans and rally points in the event that the campus must be partially or completely evacuated.

Order to Evacuate the Campus – Compliance Required

An order to evacuate the campus can come from Academia Medical Institute's Administrative Staff, from the building security personnel, or from law enforcement or fire & rescue officials. In most cases, the Director shall issue the order to evacuate once he has determined that an Emergency Situation exists, and that an evacuation is the prudent course of action. The Director may, if necessary, delegate the responsibility for issuing the order to evacuate to any member of the school's Administrative Staff. All employees and students of Academia Medical Institute shall comply fully and immediately with any evacuation order issued by any of these school personnel or outside agencies. Everyone's safety depends on strict compliance. Once a year, the property manager conducts fire drills of the entire building.

Compliance with Administrative Staff Orders in an Emergency

All employees and students shall comply with all safety orders and instructions from a member of the school's Administrative Staff in the event of an Emergency Situation.

Compliance with Law Enforcement and/or Fire and Rescue Personnel Orders

All employees and students of Academia Medical Institute shall, in the event of an Emergency Situation on campus, comply fully and immediately with all safety orders and instructions issued by an officer or authorized representative of a law enforcement agency or a fire & rescue agency.

In the event of an Emergency Situation occurring on campus, the senior members of the Administrative Staff shall be in charge of employee and student safety. Once law enforcement and/or fire & rescue personnel arrive on scene, they shall be in charge and shall remain in charge until such time as they declare that the Emergency Situation has ended.

Failure to comply with instructions from law enforcement and/or fire & rescue officers may serve to

exacerbate the danger to the health and safety of students and employees, as well as impede the efforts of the emergency personnel to neutralize the emergency. It may also place the emergency personnel in additional danger. Therefore, it is essential that no employee or student of Academia Medical Institute obstructs, interferes with or fails to comply with instructions from law enforcement and/or fire & rescue officers in the event of an emergency situation.

Disclosing the School's Emergency Procedures – Required

The Clery Act requires the school to disclose a statement of policy regarding Emergency Procedures in the Annual Report. The Director shall ensure that this statement of policy is included with the Annual Report.

Notification of an Emergency Situation on Campus – Notifying Students and Staff

In the event that an Emergency Situation occurs on the campus, the Director shall confirm the existence of the situation. The campus uses the Remind notifications to alert the campus of emergency situations. Once confirmed, the Director shall issue an emergency Notification, or she may direct members of the school's staff to issue an Emergency Notification. This notification shall be made through the Remind text and email notification system and, where needed, verbally by staff. The Director shall also instruct members of the school's staff to go to each classroom, office and common area to ensure that all students and employees are notified of the Emergency Situation and of what they are to do.

Confirming an emergency. The Director (or, in the Director's absence, the next highest-ranking employee on site) will confirm that a significant emergency or dangerous situation exists, using information from first responders, staff, or direct observation.

Determining who is notified. Because Academia Medical Institute operates from a single building, emergency notifications will ordinarily be sent to all students and employees. The Director may limit a notification to a specific class or group when the situation affects only that group.

Determining content and initiating the notification. The Director will draft the notification, describing the situation and the actions students and employees should take, and will initiate the Remind text and email system.

Academia Medical Institute will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, 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.

Notifying the larger community. When an emergency may affect people beyond Academia Medical Institute's students and employees, the Director will notify the building property manager and neighboring tenants and may post information on the Academia Medical Institute website.

Notifying Outside Agencies of an Emergency Situation on Campus

The Director shall be responsible for notifying all relevant outside agencies (law enforcement; fire & rescue, etc.) of an Emergency Situation on campus. Notifications shall be made by telephone. The Director may delegate this authority to other employees of Academia Medical Institute as he/she sees fit to do so.

In the event of an emergency situation that obviously requires the response of emergency personnel and agencies, any employee or student may, and shall, call for emergency personnel and agencies immediately. The Director shall be informed of who placed the call, as well as the justification for the call, when the emergency situation has been resolved safely. No disciplinary or adverse action shall be taken against any employee or student who notifies any emergency response agency and requests that they

respond to the campus, as long as the employee or student had reason to believe that this was the prudent course of action. The safety of all persons on Academia Medical Institute's campus and surrounding areas is, of course, paramount. See: Academia Medical Institute's policy regarding Critical Incidents listed below.

Critical Incident – All Employees and Students Shall Make Immediate Notification

In the event of clear, severe and immediate threat to the safety of any employee or any student, in which any delay in notifying the proper emergency agencies would endanger the life or safety of an individual or group of individuals, that incident shall be considered a Critical Incident. In the event of a Critical Incident, all employees of Academia Medical Institute are authorized to telephone the police and/or fire & rescue prior to notifying any senior member(s) of the school's administration. Employees of Academia Medical Institute must put the safety of any employee, student or visitor before compliance with administrative procedure. It is the policy of Academia Medical Institute that in the event of a Critical Incident, notifying emergency agencies and personnel is more important than adherence to the details of policy. No disciplinary, punitive or corrective action shall be taken against any student or employee of Academia Medical Institute who reasonably believes that the nature, immediacy and severity of an Emergency Situation qualifies that situation as a Critical Incident; requiring the immediate notification of law enforcement and/or fire & rescue agencies.

Notifying the Building Security of an Emergency Situation on Campus

The Director shall notify the building security personnel (to include all staff) of any Emergency Situation on campus. Notification shall be made by telephone, or verbally in person. The Director may delegate this authority to other employees of Academia Medical Institute as he or she sees fit to do so.

Testing Emergency Procedures

The Clery Act requires schools to test their Emergency Situation procedures at least once per calendar year.

Academia Medical Institute complies with this testing requirement through an annual emergency drill. The Director shall create and implement procedures for such simulated emergency drills. A record of these drills shall be kept by the Director. Any shortcomings to existing Emergency Procedures shall be documented, and corrective measures shall be implemented to address such shortcomings. A copy of the record of these test drills shall be included with the school's Annual Report.

The Clery Act requires that tests conducted be classified as "announced" or "unannounced." "Table Top" simulations shall be documented as "announced," as this is the only way such a theoretical drill can be conducted. In the event that Academia Medical Institute holds an Emergency Situation drill involving students, and with the permission and cooperation of the buildings' owners, management and security personnel, the test shall be "unannounced." This will provide the best evidence of the effectiveness of the school's Emergency Situation response procedures.

Timely Warnings – Defined

According to the Clery Act, a "Timely Warning" is a preemptive measure designed to alert students and employees to a dangerous situation that exists, or that has a significant probability of existing, on or very near the school's campus. The purpose of a Timely Warning is to alert students and employees to a potential danger to their health and/or safety, so that they might take steps to avoid that danger.¹⁵ Timely

Warnings shall be issued in every case where:

- A crime falling under the designation of the Clery Act as a reportable crime occurs on or very near the campus
- An Emergency Situation occurs on or very near the campus
- The crime or emergency Situation is considered by the school to represent a serious and/or continuing threat to the health and/or safety of students and/or employees

Timely Warnings – When are they Required

Under the Clery Act, Timely Warnings are required whenever the school's administration becomes aware of an incident or situation that may pose a serious threat to health and/or safety of persons on or very nearby the campus. Such situations include, but are not limited to, an ongoing series of criminal assaults on or very near the campus; a string of robberies or burglaries, etc. Schools are required under the Clery Act to issue a Timely Warning regarding such threats to health and/or safety as soon as the school's administration is made aware of the situation, and has sufficient information to issue a warning that allows employees and students to take preventive measures.

Academia Medical Institute Policy – Issuing Timely Warnings

Academia Medical Institute shall issue a Timely Warning in any situation involving a known, ongoing threat to the health and/or safety of students and employees. The campus uses the Remind text and email notification system for notification of any emergency situation. The Timely Warning shall be made as soon as the school's senior administration determines that the dangerous situation exists, and has enough information to allow the students and employees to take preventive measures to avoid the dangerous situation. Every effort shall be made to ensure that all students and employees of Academia Medical Institute are quickly and immediately informed of any Timely Warning.

Who Shall Issue Timely Warnings

The Director shall draft language for a Timely Warning. The Director shall make the Timely Warning, or he shall instruct other employees to disseminate the information. The campus utilizes mass text messages and emails as notification to the students.

How Timely Warnings Shall be Made

The information contained in the Timely Warning shall be disseminated by several different means. Employees and students shall be notified by company email, as well as in-person verbally.¹⁶ Written notifications shall be posted throughout the campus building, employees and visitors of the dangerous situation, and they shall contain information that will help students, employees and visitors avoid the dangerous situation.

Timely Warnings – Official Record

A written record shall be kept of all Timely Warnings issued by the school. This record shall be maintained by the Director. A copy of each year's record of Timely Warnings shall be included in the Annual Report.

Timely Warnings and FERPA Compliance

Timely warnings will not include the names or other identifying information of victims. Academia Medical

Institute will withhold that information as confidential in every timely warning, as required by 34 CFR 668.46(e)(1). A timely warning will include only the information needed to help students and employees protect themselves and prevent similar crimes.

SECTION IX – SEX OFFENSE PREVENTION / SEX OFFENDERS

The Clery Act requires a school to have a policy that describes steps taken by the school to prevent sex offenses on campus, as well as what the school does in response to a sex offense crime committed on campus. Section 485(f) of the Higher Education Act of 1965 (as Amended) requires schools that participate in Title IV Federal Student Aid programs to have such policies in place. This requirement applies to all schools participating in Title IV Federal Student Aid, and not only those schools with on-campus residential housing.

Academia Medical Institute Policy – Sex Offense Prevention Program

Various programs are designed to inform students and staff about campus security procedures and practices and to encourage students and students to be responsible for their own and others' security. Campus security concerns are addressed in weekly informal meetings in the classroom and with staff. Students, staff and faculty are provided a copy of this Annual Security Report. Special security bulletins will be distributed, if a need arises, to advise students or associates of community crime patterns and suspect information. New staff are provided with security orientation information during their initial employment evaluation period.

Academia Medical Institute is committed to providing a safe and welcome environment to all students, employees and visitors. It is the policy of this school that there is, and shall always be, zero tolerance for sexual harassment and inappropriate conduct of a sexual nature. This policy is contained in the School Catalog, and every student receives a copy of this Catalog. All employees of Academia Medical Institute are advised of the school's zero tolerance policy regarding sexual harassment and inappropriate conduct of a sexual nature. Academia Medical Institute offers educational videos to students promoting the awareness of sexual assault. Information on dating violence, domestic violence, sexual assault, and stalking offer is also available to students upon request. Brochures related to various Prevention programs are available to students and staff. New students will receive this information during orientation on the first day of class, where they will be required to sign a checklist that includes a security section and is used to document the training and information given to them. New Staff will receive the same information during their new employee orientation.

For additional information students can see the Director or visit the webpages mentioned below:

<https://www.publichealth.org/resources/sexual-abuse/>
<https://www.cdc.gov/features/sexualviolence/index.html>
<https://www.acf.hhs.gov/trauma-toolkit/victims-of-sexual-abuse>

Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene.

Ongoing prevention and awareness campaigns means programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences.

Primary prevention programs means programming, initiatives, and strategies informed by research or assessed for value, effectiveness, or outcome that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe directions.

Risk reduction means options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

Procedure for Dealing with a Report of Sexual Harassment and Sex Offenses

Any student or employee who is the victim of a criminal sexual offense is encouraged to report the incident immediately. Students and employees shall report all criminal sex offenses to the Director or The Chief Academic Officer. However, in order to avoid having such incidents go unreported; students and employees are permitted to report such incidents to any employee of Academia Medical Institute.

Academia Medical Institute requires all employees to notify the Director immediately if they learn of an allegation of sexual harassment, or of a criminal sex offense. The Director shall immediately respond to the scene of the alleged offense. The victim and/or the reporting person shall be immediately escorted to an office, shielded from public view. The Director shall determine if the victim and/or the reporting person are in need of medical attention. If the Director determines that fire & rescue personnel are required, he shall contact them and have them respond to the campus. Additionally and alternatively, students and staff may call **911** in the event that they feel a criminal sex offense has been committed.

In the event that a victim and/or reporting person states that they want fire & rescue personnel to respond to the campus, the Director shall contact the requested agencies immediately. He shall not substitute his judgment for the wishes of the victim and/or reporting person. All employees of Academia Medical Institute are required to render all possible assistance in contacting law enforcement, fire & rescue and any other responsible agency to any victim or reporting person who requests such assistance.

Victims of Criminal Sex Offenses – On-Campus and Off-Campus Counseling

Academia Medical Institute has no resources for, and therefore does not provide, any on-campus professional counseling services to victims of criminal sex offenses. Academia Medical Institute does not enter into contracts or agreements with, and therefore is unable to recommend, any specific off-campus counseling services for victims of a criminal sex offense. Victims of criminal sex offenses shall be encouraged to learn of such available services and resources from law enforcement and fire & rescue personnel, who will have such information and who can assist the victim in obtaining these services.

The Blendon Township Police Department will have this information, and will make it available free of charge to any person or persons who ask. Contact the Blendon Township Police Department at:

Address: 6340 S Hempstead Road, Westerville, OH 43081
Phone Number: (614) 889-9494

Notification to Law Enforcement of an Alleged Criminal Sex Offense

Victims and reporting persons shall be encouraged (but not unduly pressured) to report all crimes – including allegations of criminal sex offenses – to the local law enforcement agency. In the event that a victim and/or reporting person requests that law enforcement personnel respond to the campus, the Director shall immediately notify the local law enforcement agency and ask that they respond to the campus.

In the event that a victim and/or reporting person refuses to speak with law enforcement officers, the Director shall, if he concludes that a criminal offense has occurred or may have occurred, inform local law enforcement personnel of the incident. The unwillingness of a victim and/or reporting person to speak to the police does not remove the school's obligation to notify the police if there is reason to believe that a crime has occurred, or may have occurred.

The Director is required to notify law enforcement in any instance where he has reason to believe that a crime has transpired, or may have transpired, on the school's campus. There shall be no exception to this policy.

Identifying Potential Witnesses

The Director shall obtain the names and contact information for any student, employee or visitor that may have witnessed the offense. This information shall be turned over to law enforcement officials upon their arrival.

Neither the Director, nor any employee of Academia Medical Institute, shall attempt to conduct a criminal investigation of an alleged sex offense. Academia Medical Institute personnel do not possess the training and experience to do so, and doing so could compromise the official police investigation. All employees of Academia Medical Institute shall allow the police to conduct the official criminal investigation, and shall cooperate fully and immediately with all law enforcement personnel.

In the event that a victim and/or reporting person refuses to speak with law enforcement officers, the Director shall, if he concludes that a criminal offense has occurred or may have occurred, inform local law enforcement personnel of the incident. The unwillingness of a victim and/or reporting person to speak to the police does not remove the school's obligation to notify the police if there is reason to believe that a crime has occurred, or may have occurred.

The Director is required to notify law enforcement in any instance where he has reason to believe that a crime has transpired, or may have transpired, on the school's campus. There shall be no exception to this policy.

Preservation of Evidence – Employees' Responsibilities

The preservation of evidence is a critical factor in any criminal investigation. Employees of Academia Medical Institute shall make every reasonable effort to preserve all potential evidence of a criminal sex

offense by isolating the crime scene and not allowing any person to enter, with the exception of law enforcement. Academia Medical Institute employees shall not allow any person to discard or otherwise do away with any object or materials that might be of evidentiary value to the police. If necessary, Academia Medical Institute employees are permitted to take possession of any such discarded items and preserve them for the police. However, Academia Medical Institute employees shall not attempt to identify or gather evidence for the police, as employees do not have the training and experience to do this properly. No person, other than a law enforcement officer, shall be allowed to remove any item from an alleged crime scene.

Rendering Assistance to Victims and Witnesses

The Clery Act requires schools to comply with a student's request for a change in his or her academic situation if he or she is a victim of a criminal sex offense. Academia Medical Institute shall provide all possible assistance to victims and witnesses of criminal sex offenses. No punitive or otherwise negative actions shall be taken against any victim or witness who wishes to miss classes, or who wishes to be assigned to a different class or cohort group as a result of the incident.

Academia Medical Institute employees are required to keep all information concerning a criminal sex offense in the strictest confidence. They are to speak of such incidents only with law enforcement personnel, fire & rescue personnel, and with school administrators who are conducting an internal procedural investigation.

Sex Offenses on Campus – Media Relations

Employees of Academia Medical Institute shall not under any circumstances speak to media personnel regarding an allegation of a criminal sex offense on campus. If an official statement is to be made by and on behalf of the school, it shall be made by the Director. No photographs shall be taken, or allowed to be taken, of the crime scene. Only law enforcement personnel shall be permitted to photograph the crime scene.

Actions to be Taken in the Aftermath of a Criminal Sex Offense on Campus

After the police have concluded their on-site investigation, the area or room where the alleged criminal sex offense took place (the crime scene) shall be closed to access by all students and employees. The Director shall determine when to open the area or room for use.

If law enforcement officers instruct that the area or room be closed to all access except by law enforcement personnel because it is a crime scene, then the Director shall make the necessary arrangements. The closed area shall not be opened for use until permission is granted by the law enforcement agency that is investigating the allegation. All employees and students shall obey instructions from law enforcement authorities and not enter any room or other location deemed sealed pending a criminal investigation.

School Disciplinary Actions in Cases of Criminal Sex Crimes

The Clery Act requires schools to conduct disciplinary actions for students accused of committing a criminal sex offense in a prescribed manner. As a result, Academia Medical Institute shall process student disciplinary actions for students of committing a criminal sexual offense in a manner that is more involved,

and more complicated, than is the manner for processing other disciplinary actions.

Any student who is convicted of a criminal sex offense shall be permanently withdrawn from school immediately. The student shall not be permitted to re-enroll under any circumstances. A criminal conviction for a violent felony crime is cause for immediate and permanent withdrawal. Allowing such a student to remain enrolled and participate in classes and activities would expose students and employees to an unacceptable threat to their safety, and would seriously disrupt the school's environment to the degree that it would hinder the educational mission of Academia Medical Institute.

Registered and/or Convicted Sex Offenders

Academia Medical Institute requires background checks to be performed for its enrolled students.

Disciplinary Investigation Required

In the event that the alleged perpetrator is a student, and the student is not charged and convicted of the offense in a criminal court, Academia Medical Institute shall conduct an investigation to determine whether the accused student should be temporarily or permanently withdrawn from school, or whether the accused student should be allowed to remain in school. The investigation results shall be presented to an Administrative Panel (made up of the Director and Instructors) for review and decision on the proper course of action. In the event the Administrative Panel determines that the accused student has committed misconduct, the Panel shall recommend to the Director that the student be involuntarily and permanently withdrawn from Academia Medical Institute.

Such investigations shall not be conducted until the conclusion of the criminal investigation conducted by law enforcement personnel; nor shall they be conducted before the conclusion of the accused student's criminal trial, if the student is charged and tried for the offense.

Disciplinary Investigation – Panel Composition

The panel that shall decide whether to allow the student to remain in school shall be composed of the Director and Lead Instructor. Upon reviewing the case, and after hearing from all witnesses, the panel shall render a decision. This decision shall be presented to the Director. The Director shall make the final determination. Students may not appeal a final decision from the Director.

Disciplinary Investigation – Right to Call Witnesses and Present Evidence

Any student facing involuntary withdrawal from school because of allegations of criminal or administrative misconduct shall have the right to challenge the evidence against him or her; the right to call witnesses in his or her defense, and the right to call character witnesses in his or her defense.

Any student facing involuntary withdrawal shall not have the right to confront the alleged victim in the course of a Disciplinary Investigation. While this right exists for defendants in a court of law, a school Disciplinary Investigation is not a court of law. To subject the alleged victim of a criminal sex offense to questioning by the alleged perpetrator would place the alleged victim in a position that is clearly dangerous to his or her health and well-being. The Disciplinary Investigation Panel shall accept statements from both the alleged victim and the alleged perpetrator, at different times and in different locations.

Findings and Decisions of the Disciplinary Investigation – Duty to Notify

Under the Clery Act, both the alleged victim and the alleged perpetrator of a criminal sex offense must be notified of the outcome of any internal investigation into the matter. The Director shall notify both the alleged victim and the alleged perpetrator of the outcome of the investigation, as well as what disciplinary action the school shall take (or not take) in the matter.

Criminal Sexual Offenses Committed by Academia Medical Institute Employees

Any employee of Academia Medical Institute who commits any criminal sex offense shall be discharged. Any allegation of the commission of a criminal sex offense by an employee shall be handled in the same manner as that of a student similarly accused, except that there shall be no administrative disciplinary investigation. All employees of Academia Medical Institute are “At Will” employees and may be discharged at any time.

Obtaining Information on Registered Sex Offenders in the Area of the School

Academia Medical Institute is located in Westerville, Ohio area that has both commercial and residential properties. Students and prospective students have a right to obtain current information regarding the possible presence of registered sex offenders in the area of the campus. This information is available free of charge from the appropriate authorities.

Information on Registered Sex Offenders residing or working near the campus may be obtained either from local law enforcement, or from an internet database maintained by the Ohio Attorney General’s Office. To obtain information on registered sex offenders from the Blendon Township Police Department

Blendon Township Police Department

Address: 6340 S Hempstead Road, Westerville, OH 43081

Phone Number: (614) 889-9494

To obtain information on Westerville, Ohio registered sex offenders, go to:

<https://www.icrimewatch.net/index.php?AgencyID=55149&disc=>

Informing the alleged victim and the alleged perpetrator of these findings does not constitute a FERPA violation. Individuals seeking information on registered sex offenders in Ohio must keep in mind that there are certain restrictions on the release of information, as well as criminal penalties for anyone who misuses information obtained from the Ohio sex offender registration database. All persons seeking information on registered sex offenders in Ohio are strongly urged to familiarize themselves with these restrictions and legal requirements. This information is available at :

<https://www.nsopw.gov/en/Conditions/JurisdictionConditions/OH>

SECTION X – POLICIES REGARDING ILLEGAL POSSESSION, DISTRIBUTION AND USE OF ALCOHOL AND DRUGS / SUBSTANCE ABUSE

Academia Medical Institute has a zero tolerance policy for any student or employee who possesses, uses, sells, or furnishes illegal drugs and/or alcoholic beverages. The possession, distribution, and use of illegal drugs are serious violations of the law, and create a hazardous environment for students, employees and visitors of Academia Medical Institute. Students and employees may not bring onto campus any alcoholic beverage or illegal drugs at any time. All policies below apply to students and employees.

Academia Medical Institute regarding alcoholic beverages and illegal drugs is as follows:

- As a matter of policy, Academia Medical Institute prohibits the unlawful manufacture, possession, use, sale, dispensation, or distribution of controlled substances and the possession or use of alcohol by students and employees on its property. Any violation of these policies will result in appropriate disciplinary actions up to and including expulsion in the case of students and termination in the case of employees, even for a first offense. Possession, distribution, and/or use of any illegal drugs will be reported to the police without exception.

Substance Abuse Prevention Policy

Any student who appears to be under the influence of drugs or alcohol while on campus shall be brought to the attention of the Director and Instructors. All students and employees are required to report any such students immediately. A student who is under the influence of drugs or alcohol while on campus poses a serious risk to the students and employees of the school, as well as to himself or herself. Students who have reason to believe that a student is under the influence of drugs or alcohol may report this information to any employee of Academia Medical Institute. Employees who receive such information from a student are required to notify the Director immediately.

Students May Notify Confidentially

Any student who has reason to believe that a student is under the influence of drugs or alcohol while on campus may report this information to any employee of Academia Medical Institute anonymously. Under no circumstances shall employees of Academia Medical Institute disclose the identity of a student who has made such a report to any other student, or to any person outside of Academia Medical Institute (except for law enforcement officers and fire & rescue officers, if necessary). Any record of such a report shall be kept in the strictest confidence, and all records of such reports (if any) shall be maintained in the Office of the Director.

Confronting a Student Suspected of Being Under the Influence of Drugs or Alcohol

Any student who is reported as being under the influence of drugs or alcohol, as well as any student who is suspected by an employee of being under the influence of drugs or alcohol, shall be removed from class immediately. The Director and the Instructor shall be responsible for removing the student from class. This removal shall be conducted as discreetly as possible. The employees shall not disclose the reason for this removal in the presence of the other student.

Interviewing a Student Suspected of Being Under the Influence of Drugs or Alcohol

The student shall be taken to a private office. No non-essential personnel shall be present during the interview. The interview shall be conducted by the Director and/or Instructor. Any of these school officials may conduct the interview. One other employee of Academia Medical Institute (preferably one of the two persons authorized to conduct the interview) shall be present as a witness.

The interview shall be conducted in a conversational, rather than in an accusatory manner. The student shall be informed of the suspicion that he or she is under the influence of drugs or alcohol. The student shall not be scolded, threatened, or intimidated. The student shall not be threatened with arrest, or with notification of law enforcement personnel. The interviewing employee shall state the reasons for the suspicion (but shall not identify the reporting student, if any) and inform the student that the school is concerned for the safety and well-being of both the student and the school. The interviewing employee shall ask the student directly whether he or she is currently under the influence of drugs or alcohol.

Student Admits to Being Under the Influence of Drugs or Alcohol

If the student admits to being under the influence of drugs or alcohol, the interviewer shall remind the student that it is school policy to prohibit the possession, sale, or use of drugs and/or alcohol on campus. The student shall be informed that he or she shall not be permitted to return to class that day.

Transporting an Impaired Student from the Campus

Arrangements shall be made to ensure that the student is transported safely home. Under no circumstances shall any employee of Academia Medical Institute allow a student who is under the influence of drugs or alcohol to drive himself or herself home. To do so would be to permit a highly dangerous situation to take place. The student shall be allowed to contact a friend or relative in order to arrange for transportation home. The student's personal vehicle shall be secured in the parking structure. If necessary, the employee shall notify law enforcement and inform them of the situation. This shall be done only if there is no other peaceful, legal means by which the student can be dissuaded or prevented from attempting to drive a motor vehicle while under the influence of drugs or alcohol.

Safety Concerns Outweigh Privacy Concerns

No employee of Academia Medical Institute shall transport a student suspected of being under the influence of drugs or alcohol without the prior permission of the Director.

Student Denies Being Under the Influence of Drugs or Alcohol

In the event that the student denies being under the influence of drugs or alcohol, the Director will make a determination as to whether the student shall be allowed to return to class. The Director shall evaluate the student's physical condition, as well as any behaviors and/or symptoms that might lead a reasonable person to conclude that the student was in fact under the influence of drugs or alcohol.

***Note:** Employees of Academia Medical Institute are not doctors; nor are they law enforcement officers. They lack the training and expertise to make a conclusive diagnosis of drug or alcohol impairment, so they shall not attempt to do so. No employee of Academia Medical Institute shall

attempt to conduct a medical examination of a student, a Drug Recognition Expert Evaluation of a student, or attempt to administer a field sobriety test (FST) to a student. Any employee of Academia Medical Institute who does or attempts to do any of the aforementioned things shall be subject to discipline; up to and including termination.

Determination of Impairment – Negative

If the Director believes that the student is not impaired and poses no danger to the safety of others, then she may allow the student to return to class. The Director shall document the incident, as well as their conclusions, in a written report. The report shall be kept in a confidential file in the Office of the Director. No copies shall be made of this report, and no part of it shall appear in the student's files.

Determination of Impairment – Positive

If the Director determines that in her best judgment the student is impaired by drugs or alcohol, the student shall not be allowed to return to class that day. The Director shall remind the student that it is school policy to prohibit the possession, sale, or use of drug and/or alcohol on campus. The student shall be transported home in the same manner as if he or she had admitted to being impaired.

Students with Substance Abuse Problems – Assistance with Obtaining Treatment

Any student who notifies any employee that he or she has a substance abuse problem shall be directed to the Office of the Director. The student's admission of a substance abuse problem shall be kept in the strictest confidence. The student shall be encouraged to take full advantage of any reputable counseling and treatment services available. Academia Medical Institute shall assist a student with a substance abuse problem as much as is possible, given the school's policies, resources and legal constraints.

The Director shall assist the student with obtaining professional help by informing him or her of the many social and community services available to treat substance abuse in the Westerville area. The Director shall maintain information on local drug and alcohol treatment programs; whether they are free or charge for their services, as well as contact information. This information shall be provided to the student at no cost.

Academia Medical Institute recommends that students take advantage of the resources both online and otherwise – provided by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA). SAMHSA maintains a list of recognized treatment services and facilities throughout the United States. Students can find a nearby treatment center recommended by SAMHSA at the following website: <http://findtreatment.samhsa.gov/>

Director Shall Not Conduct Counseling

The Director shall explain to the student that Academia Medical Institute does not employ or contract with professional substance abuse counselors, and that the Director is neither qualified nor legally permitted to offer counseling in this matter. The Director shall attempt to persuade any student with a substance abuse problem to seek professional counseling and treatment.

Director – No Legal Confidentiality

The Director shall inform the student that neither she nor any employee of Academia Medical Institute

has any recognized legal authority to keep what a student says in and Attorney/Client or Priest/Penitent relationships. If a student were to disclose information regarding criminal activity, the Director is required by law to notify the police. Anything that a student tells the Director—or any employee of Academia Medical Institute—can and must be disclosed under certain circumstances (i.e., as a result of a court subpoena).

Director Shall Not Offer any Legal Advice

The Director shall under no circumstances offer any legal advice to any student. The Director is not a lawyer, and to offer such advice would be unethical and potentially dangerous; both for the student or the school. Any student seeking legal advice in a matter related to substance abuse shall be encouraged to contact a competent attorney. In this way, the student will receive the best possible legal counsel, and the attorney-client privilege shall apply to whatever the student tells his or her lawyer.

Drug and Alcohol Abuse Prevention Methods – Announcements

All students and employees of Academia Medical Institute shall be provided with a written copy of the school's official policy regarding the possession, use, transfer, sale and distribution of alcoholic beverages and illegal drugs. Students shall be provided this written policy statement upon enrollment. Employees shall be provided this written policy statement upon being hired. This policy shall be distributed to all employees and students annually.

Drug and Alcohol Abuse Prevention Methods – Information on the Law

All students and employees of Academia Medical Institute shall be informed in writing that unlawful possession of drugs is a crime in the State of Ohio; punishable by a fine and/or imprisonment in the County Jail or the State Prison. Many illegal drugs are covered under various Federal Criminal statutes. Legal sanctions for the unlawful possession or distribution of illicit drugs and alcohol including the following:

- Ohio: Possession of a controlled substance (ORC 2925.11) is punishable by penalties ranging from a minor misdemeanor to a first-degree felony, depending on the drug and the amount, including fines, jail or prison time, and driver's license suspension. Trafficking (ORC 2925.03) carries penalties up to a first-degree felony and mandatory prison terms for larger amounts.
- Ohio: Persons under 21 may not purchase, possess, or consume alcohol, and it is illegal to furnish alcohol to persons under 21 (ORC 4301.69). Operating a vehicle while under the influence of alcohol or drugs (ORC 4511.19) is punishable by jail time, fines, and license suspension.
- Federal: Simple possession of a controlled substance (21 U.S.C. 844) is punishable by up to one year of imprisonment and a minimum fine of \$1,000 for a first offense, with greater penalties for repeat offenses. Manufacturing, distributing, or possessing with intent to distribute (21 U.S.C. 841) is punishable by substantial prison terms and fines, including mandatory minimum sentences for certain quantities.
- Local ordinances may impose additional penalties.

Specific information on drug laws for the State of Ohio can be found at:

<https://starttalking.ohio.gov/>

Information on Federal drug laws can be found on the United States Department of Justice / Federal Drug Enforcement Agency's website at: <https://www.dea.gov/>

Drug and Alcohol Abuse Prevention Methods – Health Hazard and Criminal Conviction Information

Students shall be advised that the misuse of drugs and alcoholic beverages carries serious – even fatal – health risks. This information shall include, but shall not be limited to, the following facts:

- According to the Center for Disease Control, over 15,000 people die every year from overdoses of pain-killing drugs alone.
- There are over 100 fatal drug overdoses *per day* in the United States.
- Drug overdose rates in the United States have *tripled* since 1990.
- Alcohol is a factor in many drug overdose fatalities.
- People of any age, gender, ethnicity or socioeconomic status can and do become addicted to drugs and/or alcohol.
- Drug and Alcohol addiction can lead to physical ailments, long-term health problems (often serious), accidents due to impairment, increased likelihood of contracting a communicable disease, depression, suicidal thoughts, severe mood swings, alienation and even death.
- Nearly 50% of all persons incarcerated in Federal prisons are serving sentences for drug offenses.
- Criminal conviction for a drug offense can make it extremely difficult to find housing and employment.
- Drug and alcohol abuse affects people other than the addict: family, friends, employers and colleagues are all affected by your substance abuse.
- A criminal conviction for drug-related offenses may affect eligibility for some state or private aid, professional licensure, clinical placements, and employment.

Drug and Alcohol Dependency Treatment Counseling – Outside Services

No employee of Academia Medical Institute shall solicit, accept, or enter into any agreement to refer students to an outside drug and alcohol counseling service, institution or agency in exchange for payment of any kind. Academia Medical Institute will provide information to any student seeking treatment for substance abuse that will assist the student in choosing a treatment and/or counseling facility or service. Employees of Academia Medical Institute shall not recommend any particular service, agency, institution or individual to students for the purposes of receiving treatment and counseling for substance abuse. Employees of Academia Medical Institute do not possess the requisite experience, training or credentials to offer or make such recommendations.

Drug and Alcohol Dependency Treatment Programs at Academia Medical Institute

Academia Medical Institute has no on-campus internal comprehensive programs for the treatment and/or counseling of students with substance abuse problems. Academia Medical Institute has neither the resources (human or material) nor the trained personnel to offer such programs on campus. No employee of Academia Medical Institute shall treat, attempt to treat, promise to treat or attempt to treat, or suggest that he or she can treat substance abuse problems. Any student seeking treatment for a substance abuse problem shall be counseled to consult qualified medical professionals for the treatment of such a medical condition.

The Director maintains a listing of local Substance Abuse facilities that are available upon request.

Students with Substance Abuse Problems – Attending Classes

No student shall be allowed to attend classes if he or she is believed to be under the influence of drugs or alcohol. Students who are undergoing treatment for a substance abuse problem must obtain a letter from a licensed medical professional stating that they are fit to continue classes while in treatment and that they pose no threat to the health and safety of the students, employees and visitors of Academia Medical Institute.

If a student who is undergoing treatment for a substance abuse problem is unable to obtain a clearance letter from a licensed medical professional stating that the student is fit to continue his or her program of study, and does not pose a threat to the health and safety of the students, employees and visitors of Academia Medical Institute, then that student shall not be permitted to continue his or her studies.

Students who are not permitted to continue their programs of study because they are undergoing treatment for a substance abuse problem shall be either withdrawn from school and the reason will be recorded as “Medical”. No additional information shall be maintained in the student’s file or in the student’s computer file in the campus management system (Stars). Students reentering their program of study during or after treatment must provide a letter from a medical professional indicating that he or she is fit to resume their program of study.

Students who Fail to Provide a Clearance Letter

Any student who is undergoing treatment for a substance abuse problem, who fails to provide a clearance letter from a licensed medical professional stating that the student is fit to resume his or her studies, shall be withdrawn from school. The reason for the student’s withdrawal shall be recorded as “Medical.” No additional information shall be placed in the student’s file or in the student’s computer file in the campus management system (Stars). All information regarding the student being withdrawn from school because of a substance abuse problem shall be kept in a separate confidential file in the Office of the Director.

Students Withdrawn for Substance Abuse Problems – Re-Admittance

No student who is withdrawn from school because of a substance abuse problem shall be permitted to re-enroll without first obtaining and providing a clearance letter from a licensed medical professional stating that the student is now fit to resume his or her program of study.

Academia Medical Institute Policy and Criminal Law

Academia Medical Institute shall neither adopt nor enact any policy related to drug and alcohol abuse that is in conflict with any municipal, county, state or federal law. Employees of Academia Medical Institute shall meet any and all requirements under the laws in any instance involving illegal drugs, alcoholic beverages or substance abuse. There shall be no exceptions to this policy.

Crimes on Campus Involving Drugs or Alcohol

Academia Medical Institute has a zero-tolerance policy regarding criminal behavior; including crimes involving drugs or alcohol. The commission of any crime involving illegal drugs or alcohol while on campus places the school in legal jeopardy. Any student found in possession of illegal drugs while on campus shall be reported to the police. Any student found committing any criminal offense involving illegal drugs or alcohol while on campus will be subject to disciplinary action up to and including dismissal and referral

for prosecution. Employees of Academia Medical Institute shall cooperate with law enforcement authorities in any instance involving illegal drugs or alcohol. There shall be no exceptions to this policy.

Biennial Review of Campus Drug and Alcohol Abuse Prevention Measures and Policies

All Academia Medical Institute policies and procedures pertaining to drug and alcohol abuse prevention shall be reviewed on a biennial basis to determine whether these policies are effective, and whether these policies can be improved. All Academia Medical Institute policies dealing with illegal drugs, alcoholic beverages and substance abuse problems among students shall also be reviewed whenever there has been a significant change in the municipal, county, state or federal laws that might render existing school policies out of date and in conflict with the law. The biennial review shall be conducted by the Director and a chosen biennial team. Any necessary changes to existing policies shall be completed and implemented as soon as possible.

Changes to Policy – Approval and Implementation

If any policy of Academia Medical Institute pertaining to illegal drugs, alcoholic beverages and/or substance abuse is changed, the proposed change(s) shall be submitted to the Director. The Director shall make the final decision regarding adoption and implementation of the proposed policy change(s).

Changes to Policy – Notification and Implementation

Once a policy is ordered changed by the Director, it shall be the responsibility of the Director to implement the change(s), and to notify all current employees and students. Employees shall be notified via company email, and a written copy of the new policy (including the changes) shall be attached to all such emails. Employees will have to send an electronic confirmation of receipt of the policy change(s).

The Director shall be responsible for notifying all current and prospective students of any changes to Academia Medical Institute's Drug and Alcohol Policy. Students shall be given a written announcement containing all information relevant to the policy change. All existing printed materials shall be updated to include the policy change(s). The date of the policy change(s) – in the format of "month/year" – shall be recorded on all printed forms affected by the change(s).

SECTION XI – THE VIOLENCE AGAINST WOMEN ACT OF 1994

Background

The Violence Against Women Act was developed and passed as a result of extensive grassroots efforts in the late 1980s and early 1990s, with advocates and professionals from the battered women's movement, sexual assault advocates, victim services field, law enforcement agencies, prosecutors' offices, the courts, and the private bar urging Congress to adopt significant legislation to address domestic and sexual violence. Since its original passage in 1994, VAWA's focus has expanded from domestic violence and sexual assault to also include dating violence and stalking. It funds services to protect adult and teen victims of these crimes, and supports training on these issues, to ensure consistent responses across the country. One of the greatest successes of VAWA is its emphasis on a coordinated community response to domestic violence, sex dating violence, sexual assault, and stalking; courts, law enforcement, prosecutors, victim services, and the private bar currently work together in a coordinated effort that had not heretofore existed on the state and local levels. VAWA also supports the work of community-based organizations that are engaged in work to end domestic violence, dating violence, sexual assault, and stalking; particularly those groups that provide culturally and linguistically specific services. Additionally, VAWA provides specific support for work with tribes and tribal organizations to end domestic violence, dating violence, sexual assault, and stalking against Native American women.

President Bill Clinton signed the law on September 13, 1994.

SECTION XII – HAZING POLICY (STOP CAMPUS HAZING ACT AND OHIO COLLIN’S LAW)

Policy Statement

Academia Medical Institute prohibits hazing. This policy applies to all Academia Medical Institute students, employees, and volunteers. It also applies to any student organization, as defined below, whether or not Academia Medical Institute recognizes it. The policy covers acts conducted on or off campus when the hazing takes place between two or more people who are affiliated with Academia Medical Institute.

The definitions of hazing under federal law and Ohio law appear in Section II. The willingness of a person to participate does not make an act acceptable. Hazing is also a crime in Ohio. Recklessly participating in or permitting hazing is a second-degree misdemeanor. Hazing that involves coerced consumption of alcohol or drugs resulting in serious physical harm is a third-degree felony (ORC 2903.31).

Student Organizations at Academia Medical Institute

Academia Medical Institute prohibits hazing. This policy applies to all Academia Medical Institute students, employees, and volunteers. It also applies to any student organization, as defined below, whether or not Academia Medical Institute recognizes it. The policy covers acts conducted on or off campus when the hazing takes place between two or more people who are affiliated with Academia Medical Institute.

The definitions of hazing under federal law and Ohio law appear in Section II. The willingness of a person to participate does not make an act acceptable. Hazing is also a crime in Ohio. Recklessly participating in or permitting hazing is a second-degree misdemeanor. Hazing that involves coerced consumption of alcohol or drugs resulting in serious physical harm is a third-degree felony (ORC 2903.31).

Reporting Hazing

Anyone may report hazing in any of these ways:

- to the Director,
- to any Academia Medical Institute employee, or
- to police by calling 911.

Reports of hazing received by campus security authorities or local police are included in the hazing statistics in this report.

Enforcement and Penalties

The Director or designee will investigate reports of hazing using the Investigation Procedures in Section V. Penalties for students who violate this policy may include:

- fines,
- withholding of diplomas or transcripts pending compliance or payment of fines, and
- probation, suspension, dismissal, or expulsion.

Employees and volunteers who violate this policy, including by recklessly permitting hazing, are subject to disciplinary action up to and including termination or removal. If Academia Medical Institute later recognizes a student organization, penalties may also include revoking the organization's permission to operate on campus or under Academia Medical Institute's recognition or sanction. These penalties are in addition to any criminal penalties and any penalties under other Academia Medical Institute rules.

Hazing Prevention and Awareness Programs

Academia Medical Institute provides a hazing education program for all students. The program covers hazing awareness, prevention, intervention, how to report, and this policy. It is offered during new student orientation and may be completed in person or online. Academia Medical Institute verifies each student's attendance.

Employees receive hazing awareness and reporting information during new employee orientation and annually thereafter. Academia Medical Institute's prevention program includes [describe research-informed components, for example the orientation module, annual refresher, and bystander intervention content].

Because Academia Medical Institute has no recognized student organizations, it has no organization advisors, coaches, or organization volunteers. If Academia Medical Institute recognizes a student organization in the future, it will do the following:

- provide mandatory hazing training to staff and volunteers who advise or coach the organization and have direct contact with students,
- require the organization to train its volunteers, and
- bar students who have not completed the hazing education program from participating in the organization.

Campus Hazing Transparency Report

Academia Medical Institute publishes a Campus Hazing Transparency Report at <https://www.amiohio.edu/consumer>. Because Academia Medical Institute does not establish or recognize any student organizations, the report states that there are no findings of hazing violations by student organizations. The report also includes:

- A statement that hazing statistics are published annually in this Annual Security Report, with a link to it, and information about Academia Medical Institute's hazing policies.

- The report is updated at least twice each year.

Academia Medical Institute also maintains a report of all violations of this policy or of Ohio hazing law that are reported to it. That report is updated on January 1 and August 1 of each year, is retained for five years, and does not include personally identifying information about individuals. This policy is posted on Academia Medical Institute's public website.

SECTION XIII – THE CLERY ACT ANNUAL SECURITY REPORT

Annual Report – Required

Schools are required to create and submit an Annual Report detailing all reportable crimes for the past three (3) years, yearly crime logs and daily fire logs. The Annual Report must be submitted no later than the October 1st deadline. The Annual Report must be distributed to the following persons:

- All current students
- All current employees
- All prospective students and employees

Distribution of the Annual Report – Academia Medical Institute Policy

Academia Medical Institute believes that campus crime statistics and safety issues should be made available to any person who requests them. It is the policy of Academia Medical Institute that the Annual Report shall be distributed to all required persons, and shall be made available to any person who requests a copy. There shall be no charge for a copy of the Annual Report. A printed copy of the report may be obtained from the Director during normal business hours, and is posted on the school website and on public bulletin boards on the campus.

Distribution of the Annual Report – Methods

The Annual Report shall be posted on the school's website, which is available to any student, employee, prospective student, or to any person who views the website.

www.amiohio.edu

Current students and employees shall be informed of the availability of the Annual Report by written announcement.

Completion and Distribution of the Annual Report – Responsibilities

The Director shall be responsible for preparing, distributing and submitting the Annual Report.

Daily crime logs are required only if a school has a Campus Police Department or Campus Security Department. Academia Medical Institute does not have either, so these logs are not required.

Daily fire logs are required only if a school has on-campus housing. Academia Medical Institute does not have on-campus housing, so these logs are not required.

Annual Report – Retention Requirements

Academia Medical Institute shall maintain copies of all Annual Reports for (5) years from the date of publication. The Clery Act requires schools to maintain Annual Reports for three (3) years from the date of publication. The Annual Reports shall be retained in the Office of the Director.

Annual Report / Crime Statistics – Submission to the U.S. Department of Education

The Clery Act does not require schools to submit copies of the Annual Report to the U.S. Department of Education. However, schools are required to submit annual crime statistics for the current year, and for the past two (2) years; a total of three (3) years' crime statistics. The crime statistics are to be submitted electronically via the U.S. Department of Education's website at: <https://ope.ed.gov/campussafety/#/>.

The Director shall submit the required crime statistics to the U.S. Department of Education.

Content of the Annual Report

The Annual Report shall contain all crime statistics for the calendar year that are based on crimes (a.) reported by students, employees and/or visitors to the campus, and (b.) reported to local law enforcement authorities.

The report shall contain *only* statistical information, in the form of numbers and types of crimes. No personal information, identifying information, or specific details of crimes committed shall be included in the Annual Report. Completion and/or adjudication of criminal investigations by law enforcement personnel are not required for a crime's inclusion in the Annual Report. A filing of criminal charges by the county prosecuting attorney, city prosecutor, or any other prosecuting agency is not required for a crime's inclusion in the Annual Report. No crime deemed reportable by the provisions of the Clery Act shall be excluded from reporting under any circumstances.

Contributions to the Annual Report – Who May Contribute Information

Any current student or current employee of Academia Medical Institute may contribute information that he or she believes is pertinent to the Annual Report. Students and employees are encouraged to offer suggestions and/or information that would help improve the safety and security of the school's environment.